

18 October

Record of Proceedings

18 - 21st Oct

of the

9, 054 - 9, 145

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

Court House of the Tribunal
War Ministry Building
Tokyo, Japan

The United States of America, the Republic of China,
the United Kingdom of Great Britain and Northern Ireland,
the Union of Soviet Socialist Republics, the Commonwealth of
Australia, Canada, the Republic of France, the Kingdom of
the Netherlands, New Zealand, India, and the Commonwealth
of the Philippines

-Against-

ARAKI, Sadao; DOHIHARA, Kenji; HASHIMOTO,
Kingoro; HATA, Shunroku; HIRANUMA, Kiichiro; HIRO-
TA, Koki; HOSHINO, Naoki; ITAGAKI, Seishiro; KAYA,
Okinori; KIDO, Koichi; KIMURA, Heitaro; KOISO, Kuni-
aki; MATSUI, Iwane; MATSUOKA, Yosuke; MINAMI,
Jiro; MUTO, Akira; NAGANO, Osami; OKA, Takasumi;
OKAWA, Shumei; OSHIMA, Hiroshi; SATO, Kenryo; SHI-
GEMITSU, Mamoru; SHIMADA, Shigetaro; SHIRATO-
RI, Toshio; SUZUKI, Teiichi; TOGO, Shigenori TOJO,
Hideki; UMEZU, Youshijiro;

-Accused-

Official Court Reporters

Jack Greenberg, Chief
Fred T. Abram
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Antoinette Duda
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John J. Smith
Daphne Spratt
Elvira Whalen
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Lorraine Yelden

18 OCTOBER 1946

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I N D E X
Of
EXHIBITS

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1 Friday, 18 October, 1946

2 - - -

3 INTERNATIONAL MILITARY TRIBUNAL
4 FOR THE FAR EAST
5 Court House of the Tribunal
6 War Ministry Building
7 Tokyo, Japan

8 The Tribunal met, pursuant to adjournment,
9 at 0930.

10 - - -

11
12
13 Appearances:

14 For the Tribunal, same as before.

15 For the Prosecution Section, same as before.

16 For the Defense Section, same as before.

17 - - -

18
19
20 (English to Japanese, Japanese to
21 English, Russian to English and Japanese to
22 Russian interpretation was made by the
23 Language Section, IMTFE.)
24
25

1 MARSHAL OF THE COURT: The International
2 Military Tribunal for the Far East is now in session.

3 THE PRESIDENT: Minister Golunsky.

4 MR. GOLUNSKY: If the Tribunal please,
5 about the names of those two sailors killed on those
6 ships, I have verified the whole matter and it shows
7 that there is no mistake in translation and, as it
8 appears from the document, the situation is this.
9 On the seas December 18 the ship "Svirstroy" was
10 shelled by Japanese and two men, Kovernikov and
11 Elagin, were killed. This is exhibit 819.

12 As for the second ship, "Sergey Laso,"
13 mentioned in the exhibit 820, it was not shelled;
14 it was only bombed from the airplanes and nobody was
15 killed during this bombing on this ship. After this
16 the crews of all the ships were brought ashore and
17 pooled together, and when they were ashore a shell
18 from an English ship broke into the house where they
19 lived and two men, Krivoruchko and Bochko, were
20 killed by that shell. The document does not show
21 from which ship those two men were but their names
22 are mentioned in both exhibits, 819 and 820.

23 With the Tribunal's permission, I would
24 like to take another matter up now about the document
25 2462.

THE PRESIDENT: Mr. Blewett.

1 MR. BLEWETT: If the Court please, on the 16th
2 I objected to the admission of document 2462 on the
3 ground that no rule had been requested for the admis-
4 sion of the excerpt.

5 THE PRESIDENT: That number does not recall
6 the document to me. Has it been admitted?

7 MR. BLEWETT: It was refused, your Honor.
8 We have now checked the newspaper from which this is
9 an item and, while there may be other objections sus-
10 tained as to the introduction, to save time, I shall
11 withdraw my objection to its admission.
12

13 THE PRESIDENT: Major Furness.

14 MR. FURNESS: If the Court please, at the
15 close of yesterday's proceeding the prosecutor made
16 a statement which appears on page 8054 of the record.
17 I quote: "I conclude my statement with a presentation
18 of several documents proving that up till 1945, in-
19 clusive, the Japanese Government, including the
20 defendants TOJO and SHIGEMITSU, repeatedly proclaimed
21 their loyalty to the alliance with Hitlerite Germany."
22

23 Following that statement there was intro-
24 duced into evidence as exhibit 825, a document dealing
25 with economic agreements between Germany, Italy and
Japan, dated January 21, 1943. I wish to deny any

1 implication that SHIGEMITSU had anything to do with
2 these agreements and call attention to the fact that
3 exhibit 123 shows that he did not become Foreign
4 Minister or part of the Government until April 20,
5 1943.

6 THE PRESIDENT: Yes, General Vasiliev.

7 GENERAL VASILIEV: I shall present in evi-
8 dence the text of this statement of the defendant
9 TOJO, the then Prime Minister, on the occasion of
10 the declaration of war by Germany and Italy on the
11 United States of America and of the conclusion by
12 Japan of the military agreement with Germany and
13 Italy. This statement was published in the newspaper
14 "Asahi" on December 12, 1941, document No. 2462. At
15 the same time I present for identification this news-
16 paper in a file for December, 1941.

17 THE PRESIDENT: Admitted on the usual terms.

18 CLERK OF THE COURT: Prosecution's document
19 No. 2462 will be given exhibit No. 826 for identifica-
20 tion only and the excerpt therefrom bearing the same
21 document number will be given exhibit No. 826-A.

22 (Whereupon, prosecution's document
23 No. 2462 was marked prosecution's exhibit No.
24 826 for identification; the excerpt therefrom
25 was marked prosecution's exhibit No. 826-A and

was received in evidence.)

1 GENERAL VASILIEV: I quote an excerpt from
2 TOGO's statement:

3 "The world is now divided into two groups;
4 one that vainly struggles to maintain the status quo,
5 and the other, who earnestly strives to establish the
6 rightful new order; and they are fighting the greatest
7 battle that has ever occurred in history.

8 "With just cause and substantial power, I
9 believe without doubt victory is ours.

10 "I now offer my hearty congratulations on
11 the alliance of the three countries in becoming
12 stronger than ever, and herewith express my firm belief
13 in our glorious future."
14

15 The second document showing the tenacity
16 in the realization of aims of the conspiracy and the
17 unity in aggressive war of the German-Italian-
18 Japanese bloc is a radio address of the defendant
19 SHIGEMITSU made on September 27, 1943, on the occasion
20 of the third anniversary of conclusion of the Tri-
21 partite Pact. The text of this speech has been taken
22 from a symposium of Official Announcements Concerning
23 Foreign Relations. The entire publication has already
24 been presented by me for identification and two pub-
25 lished speeches concerning the question under

1 consideration are presented in evidence, exhibit
2 773-A.

3 I quote brief excerpts from this speech
4 containing the gist of the matter, page 1 of the
5 English text:

6 "We are marching forward toward the fulfill-
7 ment of our great mission with an unfaltering spirit
8 regardless of what happens on the way. No matter to
9 what machinations and maneuvers Britain and America
10 may resort in order to induce the Badoglio regime to
11 fresh acts of betrayal and bad faith, the Axis
12 Alliance remains unshaken. The Pact of Alliance
13 shines forth as brightly as ever to illumine our
14 road to victory."

15 I omit a few lines.

16 "It is because our very existence was
17 actually endangered that we have at last taken up
18 the sword. Indeed, this war is to us no other than
19 a war of self-defense. This is precisely the reason
20 why we have steeled our determination to fight it
21 through until we gain the ultimate victory."

22 The third document which I present in
23 evidence on this same issue is a speech of the
24 defendant TOJO, the then Prime Minister, made on
25 April 15, 1944, at a meeting of Mixed Specialists

1 Commission convened in accordance with the provisions
2 of the Tripartite Pact. This document, No. 2461-A,
3 is a file of the newspaper "Asahi Shimbun" for April
4 1944 which I present for identification, while the
5 text of TOJO's speech published in the newspaper
6 "Asahi" on April 16, 1944, I tender in evidence, as
7 I have said already.

8 CLERK OF THE COURT: Prosecution's document
9 No. 2461 will receive exhibit No. 827 for identifica-
10 tion only.

11 ("Whereupon, the document above
12 referred to was marked prosecution's exhibit
13 No. 827 for identification.)

14 THE PRESIDENT: The speech is admitted on
15 the usual terms.

16 CLERK OF THE COURT: And the excerpt there-
17 from, to-wit, prosecution's exhibit No. 2461-A will
18 receive exhibit No. 827-A.

19 ("Whereupon, the document above
20 referred to was marked prosecution's exhibit
21 No. 827-A and was received in evidence.)

22 GENERAL VASILIEV: I quote a few excerpts
23 from this speech:

24 "They have mobilized their full force and
25 are now pressing the borders of the Axis territories--

1 in the East and the West. Despite their efforts our
2 strong and solid camp has not even shown the slightest
3 stir. The firm conviction of ultimate victory and
4 the undefeatable positions of Japan, Germany and Italy
5 have been all the more strengthened.

6 "I am always paying my respects to the brave
7 and courageous fight put up by the Germans and
8 Italiens in Europe; ***. Through the complete
9 cooperation given in war efforts by the countries
10 and nations within the Greater East Asia Sphere, and
11 the utilization of the abundant important resources
12 for armaments, our position of ultimate victory is
13 being strengthened day by day. Our Empire will
14 maintain this position to the last, and resolutely
15 deal blows to the enemies and thereby fight through
16 this war to the end."

17 I continue to quote page 2 of the English
18 text:

19 "Even though battle fields may be apart,
20 to the east and the west, the necessity arises for
21 us, the Axis nations, to cooperate and concert much
22 more closely and to increase our fight against our
23 common enemies, America and Britain.

24 "To meet this situation, Japan must carry
25 on connections with the countries of Germany, Italy

1 and the other Axis nations in Europe on a closer
2 basis, and smash all Anglo-American plots to segre-
3 gate Japan from the other Axis nations. We will
4 then be able to advance together towards the achieve-
5 ment of common objective and thus, with the collabor-
6 ation of Europe and Asia, gain the ultimate victory."

7 The fourth document on the same issue is a
8 congratulatory telegram sent by SHIGEMITSU on December
9 11, 1944, to Ribbentrop and Mussolini on the occasion
10 of the third anniversary of signing the military
11 alliance. The telegram was published in the news-
12 paper "Nippon Times" on December 12, 1944. I present
13 this number of the "Nippon Times" in a file for
14 identification and the text of the telegram in
15 evidence, document No. 2528.

16 CLERK OF THE COURT: Prosecution's document
17 No. 2528 will receive exhibit No. 828 for identifica-
18 tion only.

19 ("Whereupon, the document above
20 referred to was marked prosecution's exhibit
21 No. 828 for identification.)

22 THE PRESIDENT: The excerpt is admitted
23 on the usual terms.

24 CLERK OF THE COURT: And the excerpt there-
25 from bearing the same prosecution documentary number

will receive exhibit No. 828-A.

1 (Whereupon, the document above
2 referred to was marked prosecution's exhibit
3 No. 828-A and was received in evidence.)

4 GENERAL VASILIEV: I quote brief excerpts
5 from the telegram containing the gist of the matter:

6 "I also recall that on December 11, 1941,
7 the three nations, concluding a new treaty, firmly
8 pledged themselves to fight out the common war until
9 final victory and simultaneously clarified again to
10 the world their common ideal of establishing a new
11 world order."
12

13 I omit a few lines.

14 "For three years since then, the Armed
15 Forces of the three nations have achieved numerous
16 brilliant war results in the various battlefields of
17 the east and west."

18 I continue to quote on page 2:

19 "We firmly believe that after all Europe
20 will be saved by Hitler and Mussolini.

21 "The war situation in Greater East Asia as
22 everyone knows, has today entered the decisive stage.
23 Confident of final victory both on the first line and
24 on the home front, we are fighting this decisive war
25 to a finish."

1 I omit a few lines. Quote at the bottom
2 of page 2:

3 "Undoubtedly the decisive war is progressing
4 in our favor.

5 "We harbor unwavering faith in the fact that
6 the struggle for justice will emerge victorious in
7 the end. As long as Japan, Germany, Italy and other
8 Axis nations are solidly united, we need entertain no
9 doubt as to the successful outcome of the war."

10 Finally, on the same issue, namely, the
11 tenacity in the realization of the aims of the con-
12 spiracy and the unity in aggressive war I present the
13 fifth document. It is the text of the defendant
14 SHIGEMITSU's speech at the 86th Session of the
15 Diet made on January 21, 1945, that is to say, only
16 three months prior to the unconditional capitulation
17 of fascist Germany.

18 I present for identification the symposium
19 "Kanpo" dated January 22, 1945, in which this speech
20 can be found, document No. 590. An excerpt from this
21 speech is tendered by me in evidence.

22 CLERK OF THE COURT: Prosecution's document
23 No. 590 will receive exhibit No. 829 for identification
24 only.

25 (Whereupon, the document above

referred to was marked prosecution's exhibit
No. 829 for identification.)

THE PRESIDENT: The excerpt is admitted on
the usual terms.

CLERK OF THE COURT: And the excerpt there-
from bearing the same prosecution documentary number
will receive exhibit No. 829-A.

(Whereupon, the document above
referred to was marked prosecution's exhibit
No. 829-A and was received in evidence.)

GENERAL VASILIEV: Quote on page 3 of the
English text:

"The combination between our empire and the
other allied countries is becoming firmer and firmer,
and we are convinced of carrying out the current war
successfully to the last together with our allied
countries at any cost.

"I am convinced that it is our most sacred
mission to exert ourselves to carry out, together
with our allied countries both in the East and West,
the severe battles destined to exploit the future of
mankind in order to accomplish the common war aim of
making clear international justice in the war of
self-existence and self-defense."

"With this I conclude the presentation of

unconditionally accepted.

1 THE PRESIDENT: The condition has been met.

2 COLONEL ROSENBLIT: Now I enter upon the
3 presentation of evidence concerning the plans of
4 attack on the U.S.S.R. which were being worked out
5 by the Japanese Army General Staff during the Soviet-
6 German war.
7

8 I respectfully bring to the memory of the
9 Tribunal prosecution document No. 1652, exhibit No.
10 779, presented by my colleague in prosecution,
11 General Vasiliev, containing the resolution of the
12 conference in the presence of the Emperor, July 2,
13 1941. It was decided at that conference to go on
14 with the preparations for war against the Soviet
15 Union and to wait for a suitable moment to solve
16 by force of arms Japan's northern problems, to-wit,
17 her claims upon the territories of the Soviet Union.
18

19 I do not believe it is necessary to quote
20 the said document again.

21 I shall submit evidence to the Tribunal
22 which will show how the Japanese General Staff
23 carried out the decisions of that Conference of the
24 2d of July, 1941.

25 Now I submit to the Tribunal as evidence a
photostatic copy of the telegram sent by Ott, German

evidence. Further evidence on the question of
1 planning and preparing the attack on the Soviet Union
2 by Japan in the course of Soviet-German war will be
3 offered by my colleague, Colonel Rosenblit.

4 THE PRESIDENT: Colonel Rosenblit.

5 COLONEL ROSENBLIT: Beginning now on the
6 8th of October of the current year the Tribunal ruled
7 that prosecution document No. 2367, which is an ex-
8 cerpt from the defendant ARAKI's talk with ISHI"ATA,
9 reported in the "Kokumin Shimbun," be accepted in
10 evidence conditionally and the scope of the transla-
11 tion or the translated portion be increased on the
12 request of defense counsel so that the Court might
13 ascertain whose words were quoted by us, whereupon
14 the excerpt was given exhibit No. 667-A. We have the
15 full text of the talk which was published in the
16 "Kokumin Shimbun" of August 14, 1941, translated -
17 and served on the Court and the defense counsel.
18 As to the Japanese copy, the full text of it had been
19 distributed before our presentation of the case.
20 Now it is clear from the full text of the transla-
21 tion that the passage quoted by us and recorded on
22 pages 7309 and 7310 of the Court report is ARAKI's
23 own speech. I respectfully ask the Tribunal to rule
24 that the above-mentioned exhibit No. 667-A be
25

unconditionally accepted.

1 THE PRESIDENT: The condition has been met.

2 COLONEL ROSENBLIT: Now I enter upon the
3 presentation of evidence concerning the plans of
4 attack on the U.S.S.R. which were being worked out
5 by the Japanese Army General Staff during the Soviet-
6 German war.
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14 with the preparations for war against the Soviet
15 Union and to wait for a suitable moment to solve
16 by force of arms Japan's northern problems, to-wit,
17 her claims upon the territories of the Soviet Union.
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20 the said document again.

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22 which will show how the Japanese General Staff
23 carried out the decisions of that Conference of the
24 2d of July, 1941.

25 Now I submit to the Tribunal as evidence a
photostatic copy of the telegram sent by Ott, German

1 Ambassador in Japan, and Kretschmar, German Military
2 Attache in Japan, July 25, 1941, No. 1355, to
3 Reichsminister for Foreign Affairs, and concurrently
4 to the higher command, OKW, and to the Army General
5 Staff, OKH, prosecution document No. 4052.

6 THE PRESIDENT: Admitted on the usual terms.

7 CLERK OF THE COURT: Prosecution's document
8 No. 4052 will receive exhibit No. 830.

9 ("Whereupon, the document above
10 referred to was marked prosecution's exhibit
11 No. 830 and was received in evidence.)

12 COLONEL ROSENBLIT: In this telegram Ott
13 and Kretschmar state their impression of the progress
14 of the mobilization proclaimed by the Japanese after
15 Germany's attack on the U.S.S.R. This telegram will
16 prove that this mobilization was carried out for the
17 purpose of war against the U.S.S.R. I quote the
18 full text of the telegram:

19 "1) The draft of reserves slowly beginning
20 in Japan and Manchukuo on 10 July and the following
21 days, suddenly reached a large and no longer conceal-
22 able extent, especially in the 1st, 4th, 7th, 12th
23 and 16th division, and continued until today in
24 decreased strength. Until the middle of August
25 supposedly about 900,000 (nine hundred thousand)

1 reservists are to be drafted, that is the 24 to 45
2 year olds; among the eldest, however, only
3 specialists like drivers, technicians, people able
4 to speak Russian, etc. After that, another 500,000
5 (five hundred thousand) reservists, are supposedly
6 available.

7 "2) Together with the drafting of the
8 reservists on 10 July /orders came for/ a draft of
9 horses, motor vehicles, etc., and a little later,
10 instructions to firms to provide military goods of
11 consumption, like foodstuffs, candles, and others
12 till the end of September at the latest.

13 "3) On 11 (12) July limitation of the
14 use of foreign languages in the teletype and tele-
15 phone communications. In addition, starting 20 July
16 mail censorship on foreigners' letters, also within
17 Japan.

18 "4) Since 12 July prohibiting of travel by
19 railway, ship, and airplane for foreigners on gradually
20 all along distance lines within Japan and to Korea,
21 China, Formosa. Japanese are also prohibited from
22 entering Sachalin. Japanese students have to remain
23 in the vicinity of their residence.

24 "5) Since about 10 July transporting of
25 ~~troops, beginning with Quartermaster troops, technician~~

1 troops and artillery of the 16th and 1st division
2 and transport of reservists from Japan. Goal: Seishin
3 and Pashin for troops and reservists, Tientsin and
4 Shanghai only for reservists.

5 "6) Since the middle of July preparation
6 in Manchuria for billeting and the arrival of troop
7 transports. In addition increased transport of mil-
8 itary goods, which may be interpreted as the establish-
9 ing of supply bases."

10 Further on in this telegram Ott and Kretsch-
11 mar give their considerations as to the Japanese
12 military plans and the time of Japan's attack on the
13 Soviet Union. I continue quoting the telegram:

14 "7) My impression:

15 "(a) Besides the increase of Japanese troops
16 in Manchuria and probably also in North China, a new
17 army group is being formed in Korea.

18 "(b) According to conversations with officers
19 of the General Staff, besides the Japanese forces in
20 Manchuria and Korea apparently also parts of the
21 North China Army are to be used for action against
22 the Soviet Union. No clarity regarding the Japanese
23 operations plan. But it is probable that it will not
24 be limited only to an attack on the Vladivostok area
25 and in a northerly direction, but will also

1 simultaneously start in the direction of Lake
2 Baikal, along the Manchurian Railroad, through Chita,
3 and from the area of Kalgan through Outer Mongolia.

4 "(c) Time of start /of operations/ unknown.
5 One fact which might bear this out is that, in my
6 opinion, the deployment of troops will take until
7 about the middle of August, and that General OKAMOTO
8 several times mentioned in his conversations that
9 Japan would only start when the German units had
10 reached the Volga.

11 "(Signed) Kretschmar, Ott."

12 Evidence has been produced to the Tribunal
13 that the Japanese Army General Staff destroyed oper-
14 ation plans and other secret documents in August
15 1945. I refer to the testimony given by Lieutenant-
16 General KAWABE, Torashiro, former Deputy Chief of the
17 Japanese Army General Staff, which is to be found on
18 pages 7677 and 7678 of the records of the Court.

19 In his testimony KAWABE acknowledged the
20 fact that those secret documents had been destroyed
21 by the department and section chiefs of the Army
22 General Staff during the period from August 13, 1945,
23 to the date when the order of the Allied Powers was
24 received, by which order destroying documents was
25 prohibited.

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1 COLONEL ROSENBLIT: I quote the full text of
2 the certificate.

3 "CERTIFICATE

4 "Aug. 7 , 1946.

5 "The undersigned does hereby certify that
6 it is impossible to submit you the following docu-
7 ments, as they are not in our possession now.

8 "1.) All the files of 1st and 2nd Depart-
9 ments of Japanese General Staff bearing upon the plan-
10 ning of war against the USSR. (Otsu and Kan-Toku-
11 En Plans).

12 "2.) The correspondence of the General
13 Staff and the War Ministry of Japan with the Head-
14 quarters of Kwantung and Korean Armies on the ques-
15 tion of military preparation of Japan for a war
16 against the Soviet Union.

17 "Yozo MIYAMA."

18 "Chief of Correspondence Section,

19 1st Demobilization Bureau."

20 Therefore we cannot present in evidence to the
21 Tribunal the original plans of war. However, by a
22 series of affidavits and other evidence, we shall first
23 of all prove that in the Summer of 1941 the Japanese
24 Army General Staff elaborated a special plan of a
25 speedy preparation for war against the U.S.S.R. under

1 the cipher "Kan-Toku-En", and secondly: we shall
2 establish the contents of that plan.

3 I quote in evidence an excerpt from the
4 affidavit of Lieutenant-General MIYAKE, Matsuhara
5 of February 22, 1946 which has been tendered to the
6 Court (Prosecution document No. 1950, Exhibit No. 699).

7 Quote from page 8 of the English text:

8 "Answer: A document was delivered from the
9 KWANTUNG ARMY Headquarters to the Central Headquarters
10 office of the KYOWA-KAI late in 1941: on the cover
11 of the document there were written the words: "KAN-
12 TOKU-EN".

13 "Answer: It was stated in this document that
14 300,000 laborers for military construction were de-
15 manded by the KWANTUNG ARMY Headquarters from the
16 MANCHUKUO Government."

17 Now I quote in evidence an excerpt from the
18 affidavit of Major-General ANIKUSA, Shin of February
19 22, 1946 which has already been tendered to the Tri-
20 bunal (Prosecution document No. 1983 Exhibit No. 743).

21 Quote from the middle of page 6:

22 "Question: What do you know concerning the plan
23 of Kan-toku-en (A special grand maneuver of the Kwan-
24 tung Army)?

25 "Answer: From the conversations with Colonel

0,070

1 Saburo HAYASHI, Chief of the Russian Section of the
2 Second Department in the General Staff and other offi-
3 cers. I learned that the plan of the Kan-toku-en was
4 quickly drawn up after the start of attack on the
5 Soviet Union by Germany in 1941 and its contents
6 were the plan of preparation of military operations
7 for the purpose of taking military aggression against
8 the Soviet Union by Japan. And in connection with my
9 duties I was personally aware of some measures with
10 regard to the 'Kan-Toku-En' plan."

11 I quote further from the bottom of page 7:

12 "Question: Did you see any documents stamped
13 'Kan-toku-en'?

14 "Answer: Yes, in 1943 I saw such documents con-
15 cerning a financial account of the expenditure which
16 was paid out of the Kan-toku-en budget."

17 I quote in evidence an excerpt from the
18 affidavit of the Japanese TAKABE, Rokuzo, former
19 Chief of the General Affairs Department of the Manchou-
20 kuo Government, of March 26, 1946 (Prosecution document
21 No. 2239 Exhibit No. 670). We have already presented
22 this affidavit. This excerpt will prove that the
23 "Kan-Toku-En", the literal translation of which is
24 "Special Manoeuvres of the Kwantung Army" was actually
25 a ciphered plan of strengthening the Kwantung Army

1 for the purpose of attacking the USSR.

2 I quote an excerpt from page 3 of the
3 English text:

4 "Question: What do you know about the measures
5 by the 'Kwantung Special Manoeuvre,' the plan called
6 'Kan-Toku-En'?

7 "Answer: The 'Kwantung Special Manoeuvre' was
8 a name for keeping secret the actions of the Kwantung
9 Army. Actually the Kwantung Army was reinforced by
10 this plan. According to this plan there were orders
11 concerning the delivery of food and other things,
12 supplying laborers, and transportation of goods.

13 "Question: When and by whom were you made to
14 know the existence of the 'Kantokuen'?

15 "Answer: I heard about it at the beginning of
16 July SHOWA 16 (1941) from KUROKAWA, Chief of the
17 Fourth Section of the Kwantung Army Headquarters,
18 and also from UMEZU, Commander of the Kwantung Army.

19 "Question: What kind of concrete things did
20 UMEZU say concerning the 'Kantokuen' plan?

21 "Answer: During his talk with me, UMEZU told
22 me about the increasement of the troops of the Kwan-
23 tung Army and demanded the delivery of food for these
24 troops.

25 "Question: Under your command what measures

1 should be taken by the Manchurian Government regarding
2 the 'Kantokuen' plan?

3 "Answer: First of all, the delivery of goods
4 necessary for the reinforced troops, transportation
5 of these goods, the mobilization of laborers, and
6 anything else necessary for the Army.

7 "Question: When were the measures of the Man-
8 churian Government according to the 'Kantokuen' plan
9 to be realized?

10 "Answer: Its measures were to be realized with-
11 in six months. "

12 We are able to confirm the existence of the
13 "Kan-Toku-En" plan still in another way.

14 We present to the Court as evidence, a photo-
15 static copy of the directive of the Kwantung Army Head-
16 quarters of September 16, 1941, signed by the Command-
17 ing General of the Kwantung Army, the now Defendant
18 UMEZU, Yoshijiro, that the army interpreters for the
19 Kwantung Army be given additional education (Prose-
20 cution Document No. 1973).

21 We present this directive so that the Tri-
22 bunal may have a documentary evidence that in Sept-
23 ember 1941 there really existed the "Kan-Toku-En" plan;
24 and secondly that in order to carry out the "Kan-Toku-
25 En" plan, intensive training of Russian Interpreters
was necessary.

1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: I should just like to point
3 out to the Tribunal that this is another document
4 emanating from the Red Army Chief Military Prosecution
5 Department in Moscow, and, therefore, I assume would
6 be admitted, if at all, conditionally as in the past.

7 MR. GOLUNSKY: If the Tribunal please,
8 yesterday night we received from Moscow an answer to
9 our inquiry about this document, and the certificate
10 containing the information received has been dis-
11 tributed today.

12 THE PRESIDENT: Well, the condition stands
13 until the certificate is tendered in evidence later.

14 CLERK OF THE COURT: Prosecution document
15 No. 1973 will receive exhibit No. 832.

16 (Whereupon, the above-mentioned
17 document was marked prosecution's exhibit
18 No. 832 and received in evidence.)

19 COLONEL ROSENBLIT: I quote the full text of
20 the document signed by General UMEZU.

21 "The students of foreign language schools
22 in Japan and Harbin College (Harbin Gakuin) who have
23 been employed as Army interpreters on Russian lang-
24 uage since the opening of the "Kan-toku-en" should
25 be given supplementary education, in accordance with

1 the 'Outline of Supplementary Education for Kwangtung
2 Army Interpreters', as explained in the separate book-
3 let.

4 "Sept. 16, 1941

5 "Commander, Kwantung Army UMEZU, Yoshijiro."

6 Now it remains for us to present evidence
7 as regards the contents of the 'Kan-Toku-En' plan.

8 I shall now deal with the affidavit of Feb-
9 ruary 21, 1946 of Lieutenant-General TOMINAGA, Keoji
10 former Chief of the Operation Department of the Army
11 General Staff, who was later on appointed Vice-War
12 minister. This affidavit has already been submitted
13 to the Tribunal and partly quoted by Colonel Ivanov
14 (Prosecution document No. 1934 Exhibit No. 705)

15 I quote in evidence an excerpt from the afore-
16 said affidavit, page 6 of the English text:

17 "The Kan-Toku-En plan was elaborated in the
18 middle of 1941, as war broke out between the U.S.S.R.
19 and Germany. The war situation was not favorable for
20 the Red Army and we expected that the U.S.S.R. would
21 transfer her troops from the Soviet Far East to the
22 western front. On account of this, we supposed that
23 we could easily occupy the Far East."

24 I skip one line and quote further:

25 "The 'Kan-Toku-En' plan was based upon the

~~operation plan of the Army General Staff drawn out~~
1 by me in 1940. As I have mentioned before, according
2 to the former plan, the attacks on all fronts were
3 supposed to be brought about in turn with rather long
4 intervals between them; but according to the 'Kan-
5 Toku-En' plan all the blows were to be dealt simul-
6 taneously."

7 TOMINAGA then explains the defendant TOJO,
8 Hideki's point of view concerning the 'Kan-Toku-En'
9 plan.

10 I quote further from page 7 of the English
11 text:

12 "Answer. In 1941, TOJO said to me in a
13 conversation: 'The present time is very suitable
14 for an aggression against the U.S.S.R. because
15 we can carry on war without encountering any strong
16 resistance from the Soviet Army.' He further said,
17 'The Japanese Army would gain a great prestige by
18 attacking the U.S.S.R. at a time when it is ready
19 to fall to the ground, like a ripe persimmon.' TOJO
20 also said that it was necessary to increase the num-
21 ber of present units in Manchuria, as a way of prompt
22 mobilization of the Kwentung Army.

23 "Question. Do you confirm that TOJO had a
24 strong intention of aggression against the U.S.S.R.
25 at that time?

"Answer. Yes, I do."

1 The question of strengthening the Kwantung
2 Army according to the 'Kan-Toku-Ten' plan is likewise
3 disclosed in a series of other affidavits which I
4 shall present later.

5 My colleague, Colonel Ivanov, has already
6 presented to the Court as evidence, a report of the
7 Red Army General Staff concerning the increase in
8 strength of the Kwantung Army and the Japanese Army,
9 in general, for the period from 1931 through 1945.
10 (Prosecution document No. 2237, Exhibit No. 706).

11 If the Tribunal please I shall once more
12 refer to this document and call it to the Tribunal's
13 attention that by January 1, 1942, the strength of
14 the Kwantung Army had reached, 1,100,000 men,
15 and at the same time the number of tanks in the
16 Kwantung Army was doubled, whilst the number of air-
17 planes had even tripled in comparison to those of
18 1937.
19

20 We offer in evidence the affidavit of Major
21 MATSUURA, Kusuo, of May 18, 1946, who was Chief of
22 the Ciphoring Service of the Japanese forces in Inner
23 Mongolia, and later was assigned the same position in
24 the Kwantung Army. (Prosecution document No. 2153).
25 This document will show that in the same period the

1 Japanese Army in Inner Mongolie was also preparing to
2 attack the U.S.S.R.
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1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: If the Tribunal please, I wish
3 to call attention to at least one objectionable
4 question and answer in this affidavit, which I submit
5 should be removed from consideration of the Tribunal.
6 I refer particularly to the top of page 3. The
7 affidavit has very few questions quoted verbatim,
8 but the entire affidavit gives evidence of having been
9 the result of leading questions. And at the top of
10 page 3 we see a perfect example of a question which
11 is leading and which also assumes facts which have
12 not been disclosed earlier by the witness. There-
13 fore, I object to that question and answer and request
14 that they be disregarded.

15 THE PRESIDENT: The objection is overruled.
16 Mr. McManus.

17 MR. McMANUS: May I address the Court?

18 THE PRESIDENT: I had called on you to do
19 so. You are not using your earphones, and you are
20 making me repeat things unnecessarily, which I
21 resent.
22

23 MR. McMANUS: If your Honor please, this
24 might not be the propitious time, but in view of
25 the fact that I am somewhat confused, I think if
the Court will grant me that privilege of making

1 my statement concerning my client, I should like to
2 call the attention of the Court to make a simple
3 statement that in exhibit 787 the name of ARAKI is
4 not the accused in the dock. I make that statement
5 for the simple reason that several other counselors
6 made that statement, and my silence might have
7 militated against me. I would just like that noted
8 in the record. I am sorry that I am interrupting
9 the proceedings at this time, but I would like it
10 noted in the record.

11 THE PRESIDENT: Colonel Rosenblit.

12 COLONEL ROSENBLIT: I shall quote excerpts
13 from the aforesaid affidavit which will show how the
14 Japanese Command was preparing for a major war against
15 the U. S. S. R. in the fall of 1941.

16 Quote from page 3 of the English text:

17 "After the beginning of the German-Soviet
18 War, about June 23-24, 1941, Gen. OKAMURA, Commander
19 of the North China Area Army, called by cipher
20 telegram Lieut.-Gen. AMAKUSU, Commander of the Mon-
21 golia Stationary Army, and Col. KABURAGI Masataka,
22 senior staff officer in charge of military operations,
23 to the North China Area Army Headquarters in Peking.
24 The above two left for Peking about June 24, 1941.

25 "On returning from Peking, about July 5, 1941,

1 Lieut.-Gen. AMAKASU Tataro called all commanders of
2 the forces under his command for an assembly. It
3 appeared that directives concerning preparations of
4 war against the Soviet Union were given at this
5 meeting. Regarding the military operations against
6 the Soviet Union, Japanese troops in Inner Mongolia
7 had to act in concert with the Kwantung Army."

8 A few lines further, on page 3, the same
9 document reads as follows:

10 "At the same time, the Commander of the
11 26th Division who had been in charge of suppressing
12 Chinese guerilla army received orders to prepare for
13 military operations against Outer Mongolia in the
14 Feisuantaiku desert district."

15 As is clear from Major MATSUURA's testimony,
16 the matters were not limited only to conferences and
17 directives, soon actual deeds followed.

18 I further quote the same document from page 3:

19 "Early in Sept., 1941, Lieut.-Col. KOTANI,
20 General Staff Officer arrived by airplane from the
21 Kwantung Army Headquarters."

22 I skip a few lines and quote further:

23 "Since June, 1941, the discharge from
24 military service upon expiration of the term was
25 suspended, and the increase of troops was enforced by

1 newly conscripted strength. For example, over
2 5,000 appear to have arrived between June and Dec.,
3 1941."

4 I shall now quote MATSUURA's report of a
5 conversation with Captain NANI, regarding the future
6 attack on the U. S. S. R.

7 At that time MATSUURA was also a captain.
8 The relevancy of the talk of the two Japanese cap-
9 tains is doubtless because, taking into account all
10 evidence together, these talks show that the plans
11 elaborated in the upper strata, penetrated into the
12 core of the Army and were the actual themes of con-
13 versations inciting the Army to prepare for an attack
14 on the U. S. S. R.

15 I further quote the affidavit of MATSUURA
16 from p. 4:

17 "I cannot help but say that the problem of
18 an offensive against the Soviet Far East was openly
19 discussed by Japanese officers. During a conversa-
20 tion with Captain NANI, Ichiro, an officer attached
21 to the Army Intelligence Section, he stated that the
22 offensive of the Japanese army against Outer Mon-
23 golia was to be directed against Ulanbator-Zabaikalye,
24 the object which lay in making military transporta-
25 tion to the Far East difficult by cutting off the

1 Trans-Siberian Railroad."

2 In order to follow the logical development
3 of my presenting the case I need not quote from this
4 affidavit for the time being, and shall return to it
5 later on.

6 As is clear from the evidence tendered by
7 my colleague General Vasiliev and myself, the
8 Japanese attack against the U. S. S. R. was first
9 fixed at August or September, 1941.

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1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: At this time, if the Court
3 please, we should like to request information of the
4 prosecution as to the status and location of this wit-
5 ness, and should like to make the usual request for a
6 direction that he be brought and made available for
7 cross-examination.

8 (Whereupon, Colonel Rosenblit made a state-
9 ment in the Russian language.)

10 RUSSIAN INTERPRETER: The first part of the
11 statement was not heard.

12 MR. GOLUNSKY: If the Tribunal please, we
13 have sent a telegram asking for information about all
14 the Japanese witnesses whose affidavits have been
15 produced here. As soon as we get the information we
16 will submit it to the Tribunal.

17 THE PRESIDENT: The application for production
18 of the witness here will be considered.

19 Colonel Rosenblit.

20 COLONEL ROSENBLIT: As is clear from materials
21 of Military Games of the Institute of Total War
22 presented by us, prosecution document No. 1622, exhi-
23 bit No. 686-A, there are indications in those materials
24 that the Japanese attack on the U.S.S.R. was postponed
25 from the summer of 1941 to July-August 1942.

1 If the Tribunal please, I shall call for direct
2 examination, the witness, former Lieutenant Colonel of
3 the Kwantung Army SEJIMA, Ruizo, who, in 1940 through
4 1944, worked in the Operations Department of the
5 Japanese Army General Staff.

6 THE PRESIDENT: Major Blakeney.

7 MR. BLAKENEY: While we are waiting, may I
8 point out that through inadvertence the last document
9 was not admitted and given an exhibit number.

10 THE PRESIDENT: I inquired as to that. It
11 was really admitted. An objection was dealt with.
12 The only objection raised to it was dealt with, and
13 the number was then called. We treat that as admission.

14 CLERK OF THE COURT: Prosecution's document
15 No. 2153 was given exhibit No. 833.

16 (Whereupon, the document above
17 referred to was marked prosecution's exhibit
18 No. 833, and was received in evidence.)
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1 R U I Z O S E J I M A, called as a witness on
2 behalf of the prosecution, being first duly
3 sworn, testified through Japanese interpreters
4 as follows:

5 DIRECT EXAMINATION

6 BY COLONEL ROSENBLIT:

7 Q Mr. Witness, tell to the Court your name and
8 your first name.

9 A SEJIMA, Ruizo.

10 Q What is your age?

11 A Thirty-four.

12 Q What was your position in the Kwantung Army
13 before the surrender?

14 A Staff officer, First Section, Kwantung Army.

15 Q Did you or did you not work in the Operations
16 Department of the Army General Staff?

17 A Yes.

18 Q You are a war prisoner of the Soviet Army
19 at present? You are being shown prosecution document
20 No. 2673, which is written in the Japanese language.
21 This is your affidavit of September 27, 1946, isn't
22 it? Look through this document. Did you or did you
23 not write it by your own hand?

24 A Yes, I wrote it with my own hand. Yes, this
25 was written by me.

1 Q The signature which appears on all the pages
2 of the affidavit is your signature, isn't it?

3 A Yes.

4 Q Are the contents of this affidavit true to
5 fact?

6 A Yes.

7 COLONEL ROSENBLIT: I produce in evidence
8 prosecution document No. 2673, which is an affidavit
9 of the witness SEJIMA, Ruizo, of September 27, 1946,
10 in the Japanese language.

11 THE PRESIDENT: Admitted on the usual terms.

12 CLERK OF THE COURT: Prosecution's document
13 No. 2673 will receive exhibit No. 834.

14 (Whereupon, the document above
15 referred to was marked prosecution's exhibit
16 No. 834, and was received in evidence.)

17 THE PRESIDENT: Do you propose to read all
18 this?

19 We will recess for fifteen minutes.

20 (Whereupon, at 1045, a recess was
21 taken until 1100, after which the proceedings
22 were resumed as follows:)
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1 MARSHAL OF THE COURT: The International
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Colonel Rosenblit.

4 COLONEL ROSENBLIT: If the Tribunal please,
5 I shall produce in evidence prosecution document
6 No. 2673, the full text of the affidavit.

7 (Reading)

8 "I, SEJIMA, Ryuzo, ex-Lieutenant-Colonel
9 of the Japanese Army, born in 1911 state as follows:

10 "I graduated from the Military Academy in
11 1932 and from the Military College in 1938. In January
12 1940 I was attached to the Army General Staff Office;
13 then in December 1941, I was appointed member of the
14 1st Department (Military Operations Department) of
15 the Army General Staff Office, where I actually worked
16 till August 1944, 19th year of Showa.

17 "I take oath and testify as follows to the
18 facts I had been able to learn in the execution of
19 my duties while working with the Army General Staff
20 Office from January 1940 to August 1944.

21 "I. During this period I worked continuously
22 in Section II /'DAINIKA'/ 1st Department of the Army
23 General Staff Office. This section, called the Military
24 Operations Section, took charge of duties regarding
25 plans for military operations. From January 1940 to

SEJIMA

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1 December 1941, I attended to matters of general business
2 which included safe-keeping of secret documents and
3 incineration of documents for which the custody period
4 had expired. During the period that I was a member
5 of Section II, I had charge of matters regarding employ-
6 ment of military forces, and during the latter part,
7 I also participated in the drawing up of operational
8 plans, some of which I drew up myself.

9 "In about spring of 1941, I incinerated the
10 documents concerning the plans for the 1939 military
11 operations which had been kept in the document safe.
12 In the Army General Staff Office, the period of
13 custody for operational plans was generally two
14 years. Before incinerating these documents I took
15 a glance through them and found among them the plans
16 for the 1939 operations against the U.S.S.R. It was
17 thus that I learned about these plans and can still
18 recollect their outline.

19 "According to this plan, the chief strategical
20 scheme of Japan's Supreme Command, in case of a Russo-
21 Japanese war, was to concentrate our main forces in
22 Eastern Manchuria and take the offensive against Far
23 East Russia. In this case, the Kwantung Army was to
24 occupy VOROSHIWOW, VLADIVOSTOK, IMAN and then KHABA-
25 ROVSK, BLAGOVESHCHENSK and KUIBYSHEVSKA.

SEJIMA

DIRECT

1 "After I became a member of Section II, 1st
2 Department of the Army General Staff Office, I was
3 able to learn in far more detail the contents of the
4 operational plans as my duties were related to the
5 employment of military forces. It was because I
6 had to consider operational plans for the various
7 areas concerned, in the employment of military forces.
8 Accordingly, I have been able to learn the plans for
9 operations against Russia for the years 1941 and 1942.

10 "According to the operational plan for the
11 year 1941 the Kwantung Army was to concentrate its
12 main forces in the direction of the Maritime Provinces,
13 a part of its forces in the direction of BLAGOVESHCHENSK
14 and KUIBYSHEVSKA, and another part in the neighbourhood
15 of HAILAR while the reserve was to be concentrated
16 in HARBIN in the event of a Russo-Japanese war. The
17 offensive was to be taken from the SUI-REN-HO district
18 towards and from the HEI-HO district towards the
19 BLAGOVESHCHENSK and KUIBYSHEVSKA districts. Plans
20 were made for the forces in the neighbourhood of
21 HAILAR to take a defensive position in order to protect
22 offensive operations in other areas. The aim of the
23 offensive operations in the Maritime Provinces was to
24 occupy that area, while the offensive in the BLAGO-
25 VESHCHENSK and KUIBYSHEVSKA districts was meant to cut

SEJIMA

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1 the railway, to make reinforcement and supply from
2 the west impossible.

3 "In the first phase of the war, they expected
4 to occupy VOROSHILOV, VLADIVOSTOK, BLAGOVESHCHENSK,
5 IMAN, KUIBYSHEVSKA and RUKHLOVO, while in the second
6 phase, they expected as far as the situation permitted,
7 to occupy North SAKHALIN, Port PETROPAVIOVSK of
8 KAMCHATKA, NIKOLAYEVSK of the Amur River, KOMSOMOLSK
9 and SOVGAVAN.

10 "Beside the Army's plan of operation worked
11 out at the Army General Staff Office, there were as
12 a part of the operational plans, the plans for joint
13 operations to be carried out in close cooperation
14 by the Army and Navy together. Out of these plans,
15 those concerning Naval operations were worked out
16 at the Naval General Staff Office and forwarded to
17 the Army General Staff Office where they were in-
18 serted as part of the operational plans."
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SEJIMA

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1 "Accordingly, I looked through some of the
2 plans for Naval operations also. For instance, the
3 Naval operations for 1941 had the three following ob-
4 jects:

5 "(1) to protect the landings on Port PE-
6 TROPAVIOVSK of KAMCHATKA and NORTH SAKHALIN;

7 "(2) to attack the Russian Pacific Fleet
8 and blockade VLADIVOSTOK from the sea front.

9 "(3) to protect the communication line con-
10 necting Japan Proper, Korea and Manchuria by guarding
11 the TSUSHIMA channel.

12 "In 1942, the 1st Department of the Army
13 General Staff Office had worked out a new plan for
14 operations against the U.S.S.R., which was adhered to
15 until the spring of 1944. Having seen this plan many
16 times, I can still recollect its outline.

17 "Like all the previous operational plans,
18 this plan for the year 1942 was an offensive plan and
19 the operation was scheduled to commence with a sur-
20 prise attack.

21 "According to the above plan, about thirty
22 divisions were scheduled to be concentrated in MANCHURIA
23 with the main force in Eastern MANCHURIA and concentra-
24 tions of some of the forces in the SUN-VU and HAILAR
25 districts respectively. The First Front which was to

SEJIMA

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1 take the offensive against VOROSHILOV consisted of
2 the 2nd, 3rd, 5th and 20th armies. The forces of the
3 four armies were to advance in parallel so that they
4 could fight a decisive battle in the vicinity of
5 VOROSHILOV. The 2nd Front consisted of the 4th and
6 8th armies and its object was to take the offensive
7 in the SVOBODNI and KUIBYSHEVSKA districts to anni-
8 hilate the Russian forces in those areas, and cut
9 the railway. Diversional operations were scheduled
10 to be undertaken by the 6th Army in the Western areas.
11 In the first phase of the war, the Japanese Army was
12 scheduled to occupy the Russian cities in the Mari-
13 time Province and BLAGOVESHCHENSK, SVOBODNI and
14 KUIBYSHEVSKA. The forces in HOKKAIDO were to occupy
15 North SAKHALIN, and a division in Japan Proper was to
16 occupy Port PETROPAVLOVSK of KAMCHATKA.

17 "The plans for Naval operations for the year
18 1942 was in general the same as that of 1941. The
19 operational plans against the U.S.S.R. for 1943 also
20 followed the above plans for 1942.

21 "It had never been explained to me whether
22 there was to be a war against Russia or not. All I
23 knew were the military matters concerning operational
24 plans as an officer of the 1st Department of the Army
25 General Staff Office, and I have no knowledge concerning

SEJIMA

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1 political relations.

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3 "II. In about the summer of 1941, after the
4 German attack on Russia, I came to learn the following
5 facts in connection with the reinforcement of the
6 Kwantung Army.

7 "A. In about the summer of 1941, I saw,
8 at the 1st Department of the Army General Staff Office,
9 the text of the Imperial Command (handwritten) for
10 despatching two new divisions to the Kwantung Army.

11 "B. In about the summer of 1941, I saw, at
12 the 1st Department of the Army General Staff Office, a
13 military order (printed) reorganization in connection
14 with the fifteen divisions of the Kwantung Army on a
15 semi-war-time basis, which was distributed to each sec-
16 tion of the department.

17 "C. Through the documents I saw at the Army
18 General Staff Office, in other words, through the tele-
19 grams reporting the progress of mobilization in all
20 districts, I knew that a mobilization was underway in
21 Japan in the summer of 1941 to reinforce the Kwantung
22 Army. The number of mobilized men was about 300,000,
23 and I came to learn about it through calculation of
24 the strength of the Kwantung Army in 1942.

25 "The mobilization was secretly carried out,

SEJIMA

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1 and the usual elaborate send-offs for the conscripts
2 were prohibited. In Tokyo, I often saw mobilized troops
3 passing through or leaving from the stations in pro-
4 found silence.

5 "The above was written by my own hand and the
6 contents are true.

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8 "(signed) Sejima, Ryuzo"
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SEJIMA

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1 The affidavit is signed by the witness
2 SEJIMA, Ruizo, on the 27th of September, 1946, and the
3 witness was duly sworn in the presence of United States
4 Army Captain Roland Schwartz and Second Lieutenant
5 Hattori.

6 The witness is now at the disposal of defense
7 counsel for cross-examination.

8 THE PRESIDENT: Dr. KIYOSE.

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CROSS-EXAMINATION

11

BY DR. KIYOSE:

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Q In the affidavit just read, fifth page of
the Japanese text, fourth page of the English text,
second paragraph, the following words are found:
"It had never been explained to me whether there was
to be a war against Russia or not." Now, I ask you,
Mr. Witness, is this not a plan formulated regularly
whether there is any intention on the part of the
government for a policy of war or not?

THE MONITOR: Regularly every year.

A I have no knowledge whatsoever of the rela-
tions between the plans -- strategic plans of the
General Staff and the government's policy. However,
at the General Staff it is customary to formulate a
plan yearly anticipating that such a situation might

SEJIMA

CROSS

1 arise so that the General Staff can cope with the
2 eventuality.

3 Q In our country is it not the high command
4 which independently makes operational plans? Mr.
5 Witness, I ask you in our country is it not true that
6 the government is an advisory organization, advisory
7 body, and that the high command independently of the
8 government formulates operational plans?

9 THE MONITOR: Advisory to the Emperor.

10 A With respect to such problems of the highest
11 command, such as the relationship between the govern-
12 ment and the high command, I do not know a thing.

13 Q In your affidavit, Mr. Witness, you state
14 that you had participated in formulating an operational
15 plan. Did you or did you not do so at the instructions
16 of the government or the cabinet?

17 A In formulating operations plans we always
18 acted according to the orders from our superiors and
19 we had nothing to do with the cabinet.

20 THE MONITOR: No direct orders from the
21 cabinet.

22 Q Then the fact that operational plans were made
23 against a specific country does not mean, does it,
24 that the government or cabinet had any desire to make
25 war on that country?

SEJIMA

CROSS

1 THE PRESIDENT: That isn't within the scope
2 of the affidavit. We are not going to take opinions
3 of that type from this class of witness. His rank
4 is not sufficiently high to warrant such a question.

5 Q Mr. Witness, you testified with respect to
6 formulating operational plans for the years 1942 and
7 1943. Were new plans formulated for the years 1944
8 and 1945?

9 THE INTERPRETER: Correction: You testified
10 in your affidavit that you had participated in the
11 formulation of operational plans for the year 1941
12 and 1942. Were new plans made in 1944 and 1945 ?

13 A Yes. I will answer to that question, operation-
14 al plans were made for the years 1944 and 1945.

15 Q Can you give the outline of those plans?

16 A Operational plans for the years 1944 and 1945
17 consisted of defensive strategic plans.

18 THE MONITOR: Strategical defensive plans.

19 THE INTERPRETER: Strategical defensive plans,
20 rather.

21 Q Is that the end of your reply?

22 A Yes, that is all.

23 Q You just spoke of strategic defensive plans.
24 Now, even in case such plans were offensive in nature,
25 that doesn't mean that there were aggressive designs.

SEJIMA

CROSS

1 Isn't that so?

2 MR. COLUNSKY: I object to the question as
3 calling for the opinion of the witness on matters on
4 which his opinion cannot be founded.

5 THE PRESIDENT: Do you wish to support your
6 question, Dr. KIYOSE?

7 DR. KIYOSE: I thought it would be made much
8 clearer if some explanation was made with respect to
9 defensive strategical operations to which the witness
10 testified and offensive strategic operations, the
11 difference between the two.

12 THE PRESIDENT: I can't conceive that there
13 is any difference in these circumstances. You might
14 ask whether there is that difference here but that
15 wasn't the question actually.

16 Q Then, as the Court said, Mr. Witness, will you
17 briefly explain the difference between a defensive
18 and an offensive operation?

19 A Is the purport of your question this, that
20 an offensive operation means an operation which would --
21 by which the territory of a foreign country is invaded
22 by the attacking army? Is that the idea of the ques-
23 tion? Or do you mean whether or not it is aggression
24 or not?

25 Q In your affidavit you mention offensive

SEJIMA

CROSS

1 operations, in the latter part of your affidavit, and
2 that is why I should like for you to make this point
3 clear.

4 THE MONITOR: Including the point you just
5 mentioned.

6 A Whether a military operation is to be considered
7 as a defense or offense is a purely strategic matter,
8 and whether a war is a war of aggression or not is
9 completely without the scope of strategic matters and
10 I wouldn't be able to say anything about it.

11 THE MONITOR: Slight correction: Whether
12 the offensive operation constitutes aggression or not
13 is outside of the operation plan. That is the war plan.
14 That I don't know anything about.

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G 1 Q In your testimony with respect to the year
O 2 1942, Mr. Witness, you spoke of phases, the first phase
l 3 and the second phase, and later, after that, the third
d 4 phase. Were the plans of that phase of which you spoke
b 5 the westward movement? Was there such a plan or not?
e 6
r 7

& 6 THE MONITOR: A slight correction. You
B 7 spoke of the first phase and the second phase, and
a 8 later on you spoke of the westward movement, which
r 9 gave the impression that there was a third phase to
t 10 this. Was there such a third phase or following phases?
o 11

11 A According to the strategic plan which I
12 knew personally there was no such plan as a plan against
13 the western front, Outer Mongolia and Baikal region.

14 Q Mr. Witness, do you know of the years 1904
15 and 1905, the time of the first Russo-Japanese war,
16 whether or not Japan already had a planned phase to
17 fight Russia at the time?

18 THE MONITOR: A slight correction. Do you
19 know, Mr. Witness, that ever since the years 1904 and
20 1905, at the time of the Russo-Japanese war, whether
21 there was any year in the Japanese history when there
22 were no plans vis-a-vis Soviet Russia, operational
23 plans?

24 A No, I don't know about that.
25

SEJIMA

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1 Q Lastly, in the second part of your affidavit,
2 namely, on page 4, there is a statement from you to
3 the effect that since 1941 the Kwantung Army was
4 re-inforced. Since then has there been any move-
5 ment of these troops for deployment to other areas,
6 other theaters resulting in a decrease of the strength
7 of the Kwantung Army?

8 A Out of the troop re-inforcement in the
9 summer of 1941 a considerable number was deployed
10 and sent to the Pacific front; that is, the front
11 against the United States, since 1943.

12 DR. KIYOSE: That concludes my cross-
13 examination.

14 CROSS-EXAMINATION (Continued)

15 BY MR. BLAKENEY:

16 Q Mr. Witness, what were your duties in the
17 second section of the second division of the General
18 Staff office?

19 A As I have stated in my affidavit, I was in
20 charge of general matters, general affairs at first,
21 and then with respect to matters regarding employment
22 of military forces.

23 THE MONITOR: Employment of troops for the
24 whole army.

25 Q What was your connection with the drawing of

SEJIMA

CROSS

1 operations plans?

2 A As I have stated in my affidavit, in hand-
3 ling matters with respect to the employment of mili-
4 tary forces I also participated in drawing up opera-
5 tional plans. I have had occasion to see operational
6 plans.

7 Q In addition to having occasion to see them,
8 did you or did you not participate in drawing them up?

9 A By operational plans, Mr. Counsel, do you
10 mean operational plans against the Soviet Union?

11 Q Those or any others.

12 A Yes, plans which I drew personally by order
13 of my senior officer were plans, vis-a-vis the United
14 States since '43 up to the Philippine campaign or the
15 Philippine operation.

16 Q These operational plans against Russia or
17 other countries, if there were others, were all pre-
18 pared, were they not, by the General Staff office?

19 A Operational plans are made by the General
20 Staff office under the direction of the Chief of the
21 General Staff. This, after it has been reported and
22 sanction received from the Throne, becomes a formu-
23 lated operational plan of the army.

24 Q Then in the drafting of these operational
25

SEJIMA

CROSS

1 plans no assistance was received from the outside of
2 any nature, is that right?

3 A By outside do you mean outside of the General
4 Staff office?

5 Q That is what I mean.

6 A No assistance, no connection with anything
7 outside the General Staff office itself.

8 Q Therefore, in the drafting of the operations
9 plan against the Soviet Union the Commanding General
10 of the Kwantung Army had nothing to do with such plan,
11 is that correct?

12 A With respect to operational plans vis-a-vis
13 the Soviet Union, I might say that in connection with
14 the relationship between the General Staff office and
15 the Commander-in-Chief of the Kwantung Army, that the
16 Chief of the General Staff, after reporting and re-
17 ceiving the sanction of the Throne, would send di-
18 rections with respect to the operational plans to
19 the Chief or Commanding General of the Kwantung Army,
20 who adopts it and, on the basis of the plan forwarded
21 to him, formulates his plans.

22 Q That is to say, that the plan forwarded to
23 him by the General Staff office was his orders, is
24 that correct?

25 A If I should put it more literally in Japanese,

SEJIMA

CROSS

1 I would say that as follows: operational orders with
2 respect to the operational plans of the Imperial Army
3 of such and such a fiscal year, -- with respect to this
4 order, the Chief of the Army General Staff, after
5 reporting and receiving the sanction of the Throne,
6 sends instructions or orders to the Commanding Gen-
7 eral of the Kwantung Army. The Commanding General
8 of the Kwantung Army acts in accordance with this
9 order, together with which comes an Imperial order,
10 or Imperial command, for which sanction has been
11 received. Therefore, the Commanding General acts in
12 accordance with the orders of the Emperor as General-
13 issimo.

14 Q In addition to the annual operational plans
15 against the Soviet Union, were there not prepared in
16 the General Staff office annual operations plans
17 against other nations as well?

18 A As regards other countries, Japan was al-
19 ready engaged in war with the United States, Britain
20 and China; and, therefore, actual operational plans
21 were already being carried into effect.

22 Q I am not referring specifically to the time
23 when war was in progress; but I mean, in general, were
24 not such plans prepared annually?

25 A Yes, with respect to the years with which I

SEJIMA

CROSS

1 am familiar; that is, 1939 and just before the out-
2 break of war in 1941, plans were already formulated,
3 in addition to operational plans against the Soviet
4 Union, operational plans in the event of an American-
5 Japanese war, and in the event of a British-Japanese war.

6 Q And annual plans regarding operations against
7 China?

8 THE PRESIDENT: He has not made any admission
9 about annual plans, as far as I understand him. He
10 spoke of particular years, but you can clear that up,
11 if you wish.

12 MR. BLAKENEY: I understood otherwise, but
13 I will be glad to bring it out.

14 Q Mr. Witness, during the time that you served
15 in the operations section of the General Staff office
16 and for many years prior to that time, is it or is it
17 not true that the General Staff office annually pre-
18 pared operational plans of the type which we are now
19 discussing?
20

21 A Yes, that is a fact.

22 Q You have spoken of yourself destroying the
23 1939 operations plan against Soviet Russia. Was that
24 such an annual plan?

25 A Yes

SEJIMA

CROSS

1 Q You have referred also to the operations plans
2 against Soviet Russia for the years 1941 and 1942.

3 Were these also such annual operations plans?

4 A Yes.

5 Q Then my question, which has not been answered,
6 was, were such annual plans drawn also for operations
7 in the event of hostilities with China?

8 A The conflict with China began in 1937, and I
9 am only personally familiar with plans since 1939
10 at which time the conflict with China was already in
11 progress; therefore, the operational plans were
12 actually being carried out.

13 THE PRESIDENT: Does his knowledge of other
14 countries extend before 1937?

15 THE WITNESS: No.

16 Q Were you also familiar, during your period of
17 service in the General Staff Office, with annual
18 plans to be used in the event of hostilities with the
19 Philippines, French Indo-China and, perhaps, other
20 countries?

21 A For the Philippines, yes, but I don't re-
22 member for the others.

23 Q As I understand from your affidavit, these
24 operations plans were all periodically destroyed after the
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adoption of later plans. Is my understanding correct?

A Yes.

Q Then, as a matter of routine in the General Staff Office, operations plans were annually drawn up providing for operation against countries with whom Japan might come in conflict, and the plans were periodically revised and then destroyed, is that correct?

A Yes. The plans, as I have said before, were annually made; and, when the next new year approached, the plans for the former year were destroyed. But even during a year plans were constantly revised to move in accordance with the international situation.

Q Do you know whether that routine is the practice in General Staff Offices through the world?

THE PRESIDENT: Let him say first whether he served in any general staff office other than the Japanese.

MR. BLAKENEY: Obviously he did not, but I asked him whether he knew, sir.

THE PRESIDENT: I suppose we know that plans are prepared in the general staff offices of other countries, but what they would be about we would not know, nor would he.

MR. BLAKENEY: Nor do I, but I think none of

SEJIMA

CROSS

1 us care, except the fact that they do exist. We will
2 change the subject.

3 Q You have stated in your affidavit that the
4 operational plan for 1942 vis-a-vis the Soviet Union
5 was an offensive plan.

6 A Since 1942?

7 Q Yes.

8 THE PRESIDENT: This is a convenient break,
9 Major Blakeney. We will adjourn now until half-
10 past one.

11 (Whereupon, at 1200, a recess was
12 taken.)

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2 1942, Mr. Witness, you spoke of the first phase and
3 the second phase, and later after that the third phase.
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5 westward movement? Was there such a place as that?

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7 spoke of the first phase and the second phase, and
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21 1905, at the time of the Russo-Japanese war, whether
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SEJIMA

CROSS

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16 operation-- and then the operational plan against
17 Russia, or against other countries, if there were
18 others, were all prepared, were they not, by the
19 General Staff office?

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24 mulated operational plan of the army.

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SEJIMA

CROSS

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CROSS

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CROSS

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SEJIMA

CROSS

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22 are prepared in the general staff offices of other
23 countries, but what they would be about we would not
24 know, nor would he.

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4 operations plans for 1942 vis-a-vis Soviet Union, was
5 an offensive plan.

6 A Since 1942?

7 Q Yes.

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9 Major Blakeney. We will adjourn now until half-
10 past one.

11 (Whereupon, at 1200, a recess was
12 taken.)

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AFTERNOON SESSION

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The Tribunal met, pursuant to recess, at 1330.

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MARSHAL OF THE COURT: The International

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Military Tribunal for the Far East is now resumed.

5

THE PRESIDENT: Major Blakeney.

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BY MR. BLAKENEY (Continued):

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Q I will repeat the question which I was putting when we recessed. You have stated in your affidavit, Mr. Witness, that the operations plan for 1942 was an offensive plan. May we take this to mean that this plan and other plans of a similar nature were drawn in accordance with the military precept that offense is the best defense?

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THE PRESIDENT: You hardly need his assistance on that, but let him answer.

A I know that offense is the best defense, and a good offensive is the best defensive according to the principles of strategy.

Q Did these various operations plans include within them the time at which they were to be put into operation?

A I do not understand the meaning of your question.

Q Did the 1942 operations plan, vis-a-vis the

SEJIMA

CROSS

1 Soviet Union, for example, contain a provision
2 that it should go into effect at a particular time--
3 that operations should commence at a particular time?

4 A There is no mention of any particular date
5 for the commencement of the operations.

6 Q As a matter of fact, did not these plans
7 provide that they should not go into effect until
8 such time as orders were given by the Grand Imperial
9 Headquarters?

10 A In my recollection there is no -- I do not
11 recall any provisions of this matter in the operations
12 plan. With respect to the commencement of hostilities
13 against a third power this is within the -- this be-
14 longs to the Imperial authority and is prohibited --
15 correction: the commanding general of the Kwantung
16 Army cannot do it on his own initiative, that is,
17 commanding generals in the field were prohibited from
18 taking their own initiative inasmuch as the authority
19 belonged to the Imperial authority.

20 Q The 1939 annual plan for operations in con-
21 nection with the Soviet Union was never carried out,
22 was it?

23 A I do not think the operations plan were
24 carried into effect.

25 Q The 1940 plan was not carried into effect,

SEJIMA

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was it?

1 A Inasmuch as the operations plan formulated
2 by the General Staff office as against the Soviet
3 Union was to be enforced only in the event of a
4 general outbreak of general hostilities between Japan
5 and the Soviet Union, such plans were not carried
6 out until the 8th of August, 1945, when those
7 hostilities began.
8

9 Q In drawing your annual plans for operations
10 against the Soviet Union, did you use certain estimates
11 of the Soviet strength on which to base your plans?
12

13 A Matters with respect to Soviet national
14 strength, military strength and operational ability
15 were studied by the Second Department of the General
16 Staff office; in other words, the department handling
17 military intelligence. I do not know the details.

18 Q But is it not true that the First Section
19 of the General Staff office in preparing operations
20 plans took into account the estimates of Soviet
21 strength, in this case prepared by the Second Section?
22

23 A Yes, they were taken into account.

24 Q And what did those estimates show as to the
25 relative strength of the Japanese Kwantung Army and
 the Soviet Far Eastern Army during the years in which
 you were working in this section?

SEJIMA

CROSS

1 MR. GOLUNSKY: If the Tribunal please,
2 the prosecution objects to this question as being
3 outside the scope of direct examination.

4 THE PRESIDENT: He could be asked whether
5 the plans he drew up or assisted in drawing up were
6 based on the strength of the Russian Army and, if so,
7 on what strength. Major Blakeney's question is not
8 substantially different, but I think in the form I
9 suggested it would be less objectionable.

10 MR. BLAKENEY: The first half of the
11 President's question I believe he has just answered.
12 I will ask him the second half.

13 BY MR. BLAKENEY (Continued):

14 Q Upon what estimates of the strength of the
15 Soviet Far Eastern Army did you base the operations
16 plans in which you yourself participated during the
17 years that you were working in the General Staff office?

18 A I do not recall the exact figures inasmuch
19 as these figures change from year to year. However,
20 what I do remember is in 1942, according to the estim-
21 ate or judgment given by the Second Section of the
22 General Staff office, the strength of the Far Eastern
23 Soviet Army was about twenty-five divisions ground
24 forces.
25

Q Is that the only figure which you can

SEJIMA

CROSS

remember at this time?

1 A As to that I do not recall the exact figures.

2 Q Are you able to remember and state how this
3 strength of twenty-five divisions in 1942 compared
4 with the strength of the Kwantung Army at the same
5 period?

6 A I recall that the forces under the control
7 of the Commander-in-Chief of the Kwantung Army at
8 that time was about fifteen divisions.

9 THE MONITOR: In Manchuria.

10 Q And are you able to state in general whether
11 a proportion somewhat similar to that obtained during
12 the years that you were working on operations plans
13 against the Soviet Union?

14 A In comparing the strength between our forces
15 and the forces of the opposite party, we followed the
16 principle of estimating the air force, the strength
17 of the air force, the strength of the ground force,
18 the supply capacity in the rear, as well as topograph-
19 ical factors; but as I do not recall the exact figures
20 I cannot say at this time.

21 Q Do you recall it as a fact that during the
22 period when you were working on operations plans the
23 Japanese strength of the Kwantung Army was always sub-
24 stantially less than that which your Second Section
25

SEJIMA

CROSS

1 estimated to be the strength of the Soviet Far Eastern
2 Army?

3 A What I said just a moment ago was the
4 division strength on the ground; but as to general
5 or overall strength we have to take into consideration
6 air forces as well as other units which constitute an
7 army.

8 Q I am asking you whether, taking those things
9 into consideration, it was or was not a fact that
10 during the period of time in question the strength
11 of the Kwantung Army was less than what you estimated
12 the strength of the Soviet Far Eastern Army to be?

13 A Do you mean the number of soldiers?

14 Q That is one item. Suppose you give us the
15 answer in connection with that item first.

16 THE PRESIDENT: I think total strength will
17 be sufficient for our purposes.

18 Q Then give us a comparison of the total
19 strength in any way in which you are able to make the
20 comparison.

21 A I do not have -- my memory is not exact
22 enough to give you a full and exact answer.

23 MR. BLAKENEY: That is all.

24 THE PRESIDENT: Mr. McManus.

25 MR. McMANUS: If your Honor please, I would

SEJIMA

CROSS

1 like to ask this witness a few questions on duress
2 only so if the questions go outside the scope of the
3 affidavit I hope the Tribunal will bear with me.

4 THE PRESIDENT: We can concede you no
5 liberty not allowed to others, Mr. McManus. The rule
6 applies to all.

7 MR. McMANUS: Have I not the right --

8 THE PRESIDENT: Proceed to put your questions
9 and we will tell you. That is the only way to decide.

10 CROSS-EXAMINATION (Continued)

11 BY MR. McMANUS:

12 Q Would you state, please, the circumstances
13 of your internment?

14 A Early September last year I went to Habarovsk
15 in the company of the Commander-in-Chief, General
16 YAMADA.

17 Q Where have you been since then?

18 A I was with the Commander-in-Chief for two
19 months since then, and then was taken to a camp to-
20 gether with military personnel in general, officers
21 and men.

22 Q Are you presently charged with a crime?

23 A No.

24 Q How long have you been in Tokyo?

25 A I came here the 17th of last month.

SEJIMA

CROSS

1 Q Have you had any conversations with anyone
2 since you have been here?

3 THE PRESIDENT: About this case.

4 Q About this case?

5 A Only two -- Colonel Rosenblit and Chief
6 Prosecutor, Mr. Keenan.

7 Q When was the last conversation you had with
8 a member of the prosecution staff?

9 A Two nights ago I met Mr. Keenan.

10 Q Did you know Mr. Semyonov and Mr. Rodzayevsky?

11 A I do not.

12 Q Didn't you meet them in an internment camp?

13 A No, I have not. I have not met them.

14 Q Do you know the fact that they have been
15 executed?

16 A No, I do not.

17 THE PRESIDENT: What is this, a threat or a
18 promise or what?

19 MR. McMANUS: I beg your pardon, your Honor.

20 THE PRESIDENT: Is this a threat?

21 MR. McMANUS: Your Honor, I would like to
22 find out whether or not the fact that these men have
23 been executed has any bearing on this statement which
24 was made the 26th, two days ago, by this witness -- or
25 the 27th of September, I am sorry. I would just like

SEJIMA

CROSS

1 to point out to the Tribunal, if the Court please,
2 at least I was endeavoring to find out whether or
3 not the fact that these men who are not produced
4 here and who have been executed might have had some
5 bearing upon the testimony that this witness is
6 offering right now.

7 THE PRESIDENT: Is there any further
8 cross-examination?

9 No further cross-examination.

10 DR. KIIYOSE: No cross.

11 COLONEL ROSENBLIT: There is a question in
12 redirect examination.

13 REDIRECT EXAMINATION

14 BY COLONEL ROSENBLIT:

15 Q When answering the defense counsel's
16 question you said that no people other than those
17 who worked in the Army General Staff participated
18 in the working out of the operation plans. Do you
19 or do you not know whether the brains of the Army
20 General Staff were given by superior governmental
21 officers or superior officials in the country any
22 assignments with regard to the operation plans in-
23 cluding operation plans against the U.S.S.R.?

24 A As I understand, there is no interference
25 in the formulation of operational plans by the

SEJIMA

CROSS

General Staff office.

1 THE PRESIDENT: I did not hear the English
2 answer. We heard no answer in English.

3 THE INTERPRETER: I will repeat, sir. In
4 so far as I know there is no outside interference
5 in the formulation of operational plans by the
6 General Staff office.

7 THE PRESIDENT: The witness is released on
8 the usual terms.

9 (Whereupon, the witness was excused.)

10 COLONEL ROSENBLIT: To corroborate Lieutenant
11 Colonel SEJIMA, Ryuzo's testimony concerning the 1942
12 plan of war in the Kwantung Army, I shall submit in
13 evidence the photostatic copy of the statement of
14 General KITA, Seiichi, written by himself in the
15 Japanese language on April 20 through April 23, 1946.
16 General KITA, Seiichi, was commanding general of the
17 6th Army of the Kwantung Army from October, 1941,
18 until October, 1944, and from October, 1944, he was
19 commanding general of the first front of the Kwantung
20 Army, prosecution's document No. 2467.

21 THE PRESIDENT: Mr. Logan.

22 MR. LOGAN: We object to that part of this
23 affidavit going into evidence which is contained on
24 page five, the last paragraph. The first sentence in
25

1 that paragraph is a conclusion of this particular
2 witness which is not based on any facts set forth
3 in his affidavit and attempting to fix responsibility
4 for certain acts, which is usurping the functions of
5 this Court and not within the province of the witness.

6 I might remind the Tribunal that a similar
7 statement was stricken from another affidavit last
8 Friday.

9 THE PRESIDENT: We think we should read the
10 whole of the affidavit before we come to a conclusion.
11 If the statement is as bare as Mr. Logan suggests,
12 it may have no value.

13 The document is admitted on the usual terms.

14 CLERK OF THE COURT: Prosecution's document
15 2467 will receive exhibit No. 835.

16 (Whereupon, the document above
17 referred to was marked prosecution's exhibit
18 No. 835 and was received in evidence.)
19
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2 witness which is not based on any facts set forth
3 in his affidavit and attempting to fix responsibility
4 for certain acts, which is usurping the functions of
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COLONEL ROSENBLIT:

1 As KITA, Seichi, puts it in his testimony,
2 the fact that he held those offices gave him an oppor-
3 tunity of getting fully acquainted with the plans of
4 war against the U.S.S.R. that were in the Kwantung
5 Army at that time; he likewise was able to familiarize
6 himself with the preparatory measures carried on in
7 connection with war against the U.S.S.R.

8 If the Tribunal please, I quote from page 12:

9 "Preparatory Measures.

10 "Heike District: In the peace time there were
11 in this district two divisions of the Fourth Army and
12 one detachment of border guards. The Army Headquarters
13 was at Sunwu. Before the war was opened against Soviet
14 Russia the Second Area Army and Northern Army were to
15 be set up at Tsitsik and Heike respectively."

16 Correction, please: Not the Northern Army;
17 the N Army.

18 "N Army seemed to be changed to 8th Army later,
19 This formation was to be made by diverting four divi-
20 sions from China and Japan. Consequently the Second
21 Area Army was to have attained a strength of six divi-
22 sions before the outbreak of war, that is. There were
23 three divisions of the 4th Army at Sunwu, two divisions
24 of 8th Army at Heike and one division under the direct
25 control of the Area Army. Besides, the 6th Army under

1 the Second Area Army consisting of the 23d Division
2 and the Arshan detachment (about one division strong)
3 should be increased by the addition of another divi-
4 sion after the outbreak of war. Two more divisions were
5 to be added in the future.

6 "Maritime Province District: Those stationed
7 in peace time in this district were three divisions of
8 the 5th Army, three divisions of the 3rd Army, the
9 71st Division at Hunchung and one division under the
10 direct control of the Kwantung Army at Chiamusu -- eight
11 divisions in all together with two tank divisions.
12 In 1941, 20th Army Headquarters was established at
13 Tsining and to that army was given one division each
14 from the 3rd, and 5th Armies. Prior to the outbreak of
15 war, the 1st Area Army Headquarters, and the 2nd Army
16 Headquarters were to be set up at Mutanchiang and
17 Chientao respectively according to Plan B."

18 Correction: According to Plan Otsu.

19 "Eight more divisions were to be transferred
20 to this district from Japan and China, making the First
21 Area Army possess fifteen divisions and two tank divi-
22 sions, that is, three divisions and one tank division
23 of the 5th Army, five divisions and one tank division
24 of the 20th Army, three divisions of the 3rd Army, two
25 divisions of the 2nd Army and two divisions under the

1 direct control of the First Area Army. In addition
2 there was one air force army under the direct control
3 of the Kwantung Army Commander with 1,000 planes. The
4 Kwantung Army was expected to be in the above condition
5 on the Eastern, Northern and Western fronts just before
6 the opening of war against the U.S.S.R. according to
7 the Plan Otsu.

8 "Offensive Plan: In accordance with the
9 offensive Plan Otsu we expected to seize the entire
10 Far East as far as Baikal in four successive steps.
11 In the first step the 4th and the N Armies of the
12 Second Area Army were to carry out demonstrations on
13 the Russian border near Sunwa and Heike, pretending
14 offensive preparations by occasionally shooting into
15 Russian territory. No actual offensive, however, was
16 to be made. Thus the Red Army was expected to be
17 fettered within that area. Should the Red Army start
18 an offensive it must be checked. The 6th Army should
19 maintain its positions at Hailor and Arhshan. In case
20 an attack was made by the Red Army from Chita via
21 Manchuria it must be checked by keeping these posi-
22 tions firm. In this case, the 1st Area Army in the
23 Maritime Province District would act decisively on the
24 offensive according to the following plan."

25 Then follows a detailed description of the

1 operation of each army of the 1st Front, which I leave
2 out, and pass directly to the summing up of the first
3 stage operations.

4 Quote from page 13:

5 "All these forces were to press the Red Army
6 at Voroshilov, and part of them, after seizing Voro-
7 shilov, were to cooperate with the Japanese Navy at
8 Yuanshan to capture Vladivostok by envelopment. This
9 was to end the first stage. Its chief object was to
10 secure Japan proper and the industrial areas of Man-
11 churia from the Red Army's air raids from the Maritime
12 Province district, by entirely occupying the district.

13 "Second Stage: In case the first stage of
14 the offensive was successful, the main force of the
15 First Area Army was to advance Northward toward
16 Habarovska along the railroad, leaving part of the
17 Army in the Maritime Province to maintain the occupied
18 area. The division stationed at Chiamusu would occupy
19 the positions facing Leninsk to protect the wings of the
20 First and Second Armies in the vicinity. At this time
21 the 4th and the N Armies of the Second Area Army would
22 cooperate with the First Area Army and commence an
23 offensive operation from Heike and its vicinity; cross
24 the Amur; seize Blagoveshchensk, Kuibyshevsk and
25 Svobodni and cut off the Siberian Railway. One part

1 of the forces were to defend the West and the main
2 force was to move eastward along the railway line to
3 Khabarovsk. Then the First and the Second Area Armies
4 were to cooperate in attacking in a decisive battle
5 the Red Army from both sides and occupy Khabarovsk.
6 This was to complete the second stage.

7 "Third Stage: After the occupation of
8 Khabarovsk the Second Area Army would immediately turn
9 westward to make preparations for the reinforcements
10 necessary for the future offensive operations upon the
11 Zabaikalye. At this time the 6th Army at Hailar was
12 to be reinforced raising its strength to four divisions
13 which were to prepare to advance the attack. In the
14 Maritime Province the First Area Army was to secure
15 the important districts and the rear of the Second
16 Area Army. The main force of the Second Area Army
17 would turn West after completing preparations and
18 commence the advance to Chita along the railway. As
19 soon as the Second Area Army's main force reached Moga-
20 cha, the 6th Army was immediately to start the attack
21 by breaking through the border near Sanho and Man-
22 churia. And the 6th Army was to act in cooperation
23 with the Second Area Army's main force and advance to
24 Chita and its southern area. On seizing Chita and its
25 vicinity, the Second Area Army was to secure important

1 districts in the West; and thus the operation of the
2 third stage was to come to a close.

3 "In the fourth stage it was planned to conti-
4 nue the offensive until the Zabarkalye as far as Lake
5 Baikal was seized. But I do not know about the offen-
6 sive plan of the fourth stage.

7 "Operations Regarding Outer Mongolia: In
8 the third stage, at the same time as the commencement of
9 the advance of the 6th Army, the Arhshan Detachment
10 (approximately one division) was to have been brought
11 under the direct control of the Second Area Army to
12 combine with and take command of the Mongolian force
13 in Manchuria (approximately one division) and advance
14 to Chita from Arhshan via Tampsakbulak, Baintumen and
15 Ulan-Orasomon. This unit would cover the right wing
16 of the Second Area Army by marching through the eastern
17 part of Outer Mongolia.

18 "Maintaining coordination of all Military
19 Operations the Imperial Headquarters was to transfer
20 one mechanized army group from North China and to have
21 it begin strategic operations from Kalgan toward
22 Ulan-Bator. But I am not able to explain the plan for
23 the future development of the offensive action since
24 I don't know it. The general outline of the offensive
25 plan against Soviet Russia is as above. This plan for

1 the offensive operation against the Soviet Union in
2 1942 was set up by the General Staff and the Kwantung
3 Army; it was revised every year thereafter. This plan
4 for Japanese military measures existed till around the
5 middle of 1944. Since Japan faced difficult condi-
6 tions in the battle field of Greater East Asia War,
7 she could not carry out this plan."

1 Mr. President and Members of the Interna-
2 tional Tribunal, I should like to draw your attention
3 to the evidence that the defendant UMEZU, Yoshijiri
4 was Commanding General of the Kwantung Army at that
5 time and that he himself took part in working out the
6 plans of an aggressive war against the U. S. S. R.,
7 whereas the defendant TOJO, Hideki, was Prime Minister
8 and concurrently War Minister of Japan at that time.

9 THE PRESIDENT: Major Blakeney.

10 MR. BLAKENEY: I wish to make the usual
11 request for information concerning the status of this
12 witness, and the usual request for direction that he
13 be produced for cross-examination.

14 THE PRESIDENT: Mr. Smith.

15 MR. SMITH: If your Honors please, in the
16 last paragraph at the bottom of page 4, first sen-
17 tence, I ask your Honors to strike it out. It says:

18 "In 1935 Japan, by resorting to every pos-
19 sible means, induced Soviet Russia to sell the right
20 and interest of the Chinese Eastern Railways."

21 That is a bald statement, not supported by
22 any facts anywhere in this statement, and infringes
23 the province of the Court, and I submit to your
24 Honors a statement of that sort ought not to be per-
25 mitted in evidence in this case.

1 THE PRESIDENT: We think it is irrelevant
2 to any issue that is raised in the Indictment. The
3 objection is upheld.

4 We had better settle the question raised
5 by Major Blakeney in the first instance -- raised
6 by Mr. Logan, rather. What is part of the affidavit
7 can be said to support that bare statement as to the
8 responsibility of various individuals.

9 THE PRESIDENT: Minister Golunsky.

10 MR. GOLUNSKY: The part objected to by the
11 learned counsel is half a statement of responsibility
12 and half a list of different people who held official
13 positions in some way connected with the military
14 activities in Manchuria, and inasmuch as we can es-
15 tablish that from other sources we do not particularly
16 insist on this part of the affidavit.

17 THE PRESIDENT: The part objected to by
18 Mr. Logan amounts to the swearing of issues without
19 any supporting fact, and will be disregarded. The
20 objection is upheld.

21 Colonel Rosenblit.

22 COLONEL ROSENBLIT: If the Tribunal please,
23 I shall call for direct examination the witness,
24 MATSUMURA, Tomokatsu, former Major-General of the
25 Japanese Army, who from October, 1941, through

MATSUMURA

DIRECT

1 T O M O K A T S U M A T S U M U R A, called as a
2 witness on behalf of the prosecution, being first
3 duly sworn, testified as follows:

DIRECT EXAMINATION

BY COLONEL ROSENBLIT:

6 Q Mr. Witness, tell the Tribunal your name and
7 your first name.

8 A MATSUMURA, Tomokatsu.

9 Q Your age?

10 A Born 32nd year of Meiji, 1899.

11 Q You worked in the Army General Staff in the
12 capacity of Chief of the Fifth Section of the Second
13 Department from October, 1941, through August, 1943,
14 didn't you?

15 A Yes, Chief of the Fifth Section, Second Division.

16 Q Did you or did you not occupy the position of
17 Chief of First (operations) Section of the Kwantung
18 Army Headquarters from August, 1943, until March, 1945?

19 A Yes, I occupied that position.

20 Q Are you a war prisoner of the Soviet Army
21 at present?

22 A Yes, I am.

23 Q Mr. Witness, you are being shown prosecution
24 document No. 2672 in the Japanese language, which is
25 your affidavit of September 27, 1946. Look through

1 August, 1943, worked in the Second Department of the
2 Japanese Army General Staff, and from August, 1943,
3 until the surrender worked in the Kwantung Army
4 Headquarters, first in the capacity of Chief of the
5 First (operations) Section, and since March, 1945, as
6 Deputy Chief of the Kwantung Army Headquarters.

7 THE PRESIDENT: Mr. Logan's application for
8 the production of the deponent KITA will be considered.

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MATSUMURA

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21 at present?

22 A Yes, I am.

23 Q Mr. Witness, you are being shown prosecution
24 document No. 2672 in the Japanese language, which is
25 your affidavit of September 27, 1946. Look through

1 this document. Is it or is it not written in your
2 own hand?

3 A Yes, that is mine.

4 Q Does the signature which appears on all the
5 pages of this affidavit belong to you?

6 A Yes.

7 Q Are the contents of your affidavit true to
8 fact?

9 A Yes.

10 COLONEL ROSENBLIT: I tender in evidence to
11 the Tribunal prosecution document No. 2672, which is
12 an affidavit of the witness MATSUMURA of September 27,
13 1946, written in the Japanese language.

14 THE PRESIDENT: Admitted on the usual terms.

15 CLERK OF THE COURT: Prosecution document
16 No. 2672 will receive exhibit No. 836.

17 (Whereupon, the above-mentioned
18 document was marked prosecution's exhibit
19 No. 836 and received in evidence.)

20 COLONEL ROSENBLIT: If the Tribunal please,
21 I shall read the full text of this affidavit:

22 "I am MATS" URA, Tomokatsu, formerly Major-
23 General of the Japanese Army, and was born in 1899.
24 I state here as follows:-
25

"I served in the Japanese Army General

1 Staff Office in various capacities in and after 1929.
2 In October of 1941, I became chief of the 5th section
3 (Soviet Russian Intelligence) of the 2nd dept. (In-
4 telligence) in the Army General Staff Office. In
5 August of 1943, I was transferred from that post to
6 that of the chief of the 1st section (operations) of
7 the Kwantung Army Headquarters. In March 1945 I was
8 appointed Vice-Chief of Staff, Kwantung Army, remain-
9 ing in that post until the surrender.

10 "I testify as follows the facts I knew in
11 relation to my duties during the period mentioned
12 above:-

13 "1) Having arrived at the Headquarters of
14 the Kwantung Army in 1943, I, as the Chief of the
15 Strategy Section, was first of all informed of the
16 operations plan kept by the Headquarters. At this
17 time I was informed of the directives of the Army Gen-
18 eral Staff concerning the operations plan against
19 Soviet Russia for 1942 and the operations plan itself
20 of the Kwantung Army Headquarters based upon the
21 said directives.

22 "The directives of the Army General Staff
23 instructed the Kwantung Army Headquarters to form an
24 operations plan against Soviet Russia with the occu-
25 pation of the Maritime Provinces of Soviet Russia and

1 the destruction of the air bases in the Maritime
2 Province as the general objectives, and also to
3 focus the principal attack upon Voroshilov. It was
4 also written in the directives that the Kwantung
5 Army should make preparations for further operations
6 after occupation of the Maritime Provinces.

7 "The operations plan made by the Kwantung
8 Army Headquarters according to the above directives
9 in 1942 contained the following items:-

- 10 "1) The general tasks of the Kwantung Army.
11 "2) Distribution of military strength.
12 "3) The tasks of the different fronts and
13 armies.

14 "The tasks as set forth in the afore-men-
15 tioned directive of the Army General Staff were indi-
16 cated as the general tasks of the Kwantung Army.

17 "In the item of the distribution of military
18 strength, it was planned that the First Front, the
19 Second Front and the Sixth Army should participate in
20 the operation against Soviet Russia. The First Front
21 comprised 4 armies (the 2nd, 3rd, 20th, 5th Army),
22 consisting of 15 infantry divisions, and 2 tank div-
23 isions. Furthermore, besides the First Front Armies,
24 one independent infantry division was stationed at
25 CHIAMUSU in order to protect the left wing of the First

1 Area Army.

2 "The Second Front was planned to comprise
3 two Armies (the Fourth Army and a certain other Army)
4 consisting of seven divisions; and the Sixth Army
5 consisting of four divisions. Besides these there
6 were three infantry divisions as the general reserve
7 of the Kwantung Army and the Second Air Force Army
8 consisting of four air divisions were under direct
9 control of the Kwantung Army.

10 "In the item concerning the tasks of the
11 different fronts and armies, the task of the First
12 Front was indicated as follows: that the Second Army
13 should attack from CHIENTAO Area toward the Southern
14 USSURI Area; that the Third Army should attack from
15 TUNGNING Area toward VOROSHILOV; that the Twentieth
16 Army should attack from the area to the west of Lake
17 Khanka toward VOROSHILOV; and that the Fifth Army
18 should attack from HUTOW Area toward IMAN Area and
19 thereby cut off the enemy's communications extending
20 from south to north and later have one part of the
21 force cover the north and have another part advance
22 southward to facilitate the attack of the main force
23 on VOROSHILOV. Although it is not expressly indicated
24 in the plan, it can be presumed that the occupation of
25 VLADIVOSTOK was to follow that of VOROSHILOV.

1 "The tasks of the Second Front were indi-
2 cated as follows: that the Fourth Army and a certain
3 other Army should be stationed in the SUN-WU and HEI-
4 HO Areas respectively, where they were to check the
5 Soviet Army in the AMUR River Area.

1 "The task of the Sixth Army was to stand
2 on the defensive in the HSINGAN mountain-range against
3 the Soviet Army from ZABAIKALYE and cover the offensive
4 operation of the First Front.

5 "The operations plan against Soviet
6 Russia for 1942 was signed by General UMEZU,
7 Commander of the Kwantung Army, Lieutenant-General
8 KASAHARA, Chief of Staff, and Colonel TAMURA, Chief
9 of the Operations Section.

10 "It was not clear to me whether a war
11 against the Soviet Union would be carried on. I
12 know only of matters related to operations. Matters
13 concerning the political aims of war against Soviet
14 Russia were under the authority of the government,
15 and I know nothing about them. As for the opera-
16 tions plan against Soviet Russia in 1943 the Army
17 General Staff gave us no new directives whatever.
18 Therefore, according to the general practice in
19 the Army, the plan for 1942 was followed in 1943
20 as well.

21 "Immediately after my assumption of office
22 in October 1941 as Chief of the 5th Section (Soviet-
23 relations) of the 2nd Department, Lieutenant-General
24 OKAMOTO, Seifuku, the Chief of the 2nd Department,
25 gave me an order in his office to deliver the

1 intelligence relating to the Soviet Union collected
2 by the 5th Section to the 16th Section (GERMAN
3 RELATIONS) of the 2nd Department. On this
4 occasion, Lt. General OKAMOTO explained to me
5 that the intelligence was wanted by KRETSCHMAR,
6 German military attache. Thenceforth, in accordance
7 with the orders given by Lt. General OKAMOTO, Seifuku,
8 Chief of the 2nd Department, and his successor Lt.
9 General ARISUE, Seizo, I systematically forwarded
10 to the 16th Section (GERMAN RELATIONS) for Colonel
11 KRETSCHMAR the intelligence regarding Soviet mili-
12 tary forces, their disposition in the Far East,
13 war potential of the Soviet Union, movement of
14 Soviet divisions to the west from the Far East,
15 internal movements of Soviet strength, and recon-
16 struction of the withdrawn Soviet industries.
17 These intelligences were based upon materials
18 reported to the General Staff Office from Japanese
19 military attaches in MOSCOW and various other
20 intelligence sources. They were arranged by
21 officers of my section and after my examination
22 were delivered directly to the 16th Section.
23 Sometimes important ones were delivered to the
24 16th Section after I had examined them and after
25 Chief of the 2nd Department had gone over them.

1 "We used to deliver intelligence to the
2 16th Section (in charge of German affairs) about
3 once a month..

4 "The above was written by my own hand
5 and the contents are true."

6 The affidavit is signed by the witness
7 MATSUMURA, Tomokatsu September 27, 1946, and the
8 witness was duly sworn in the presence of the
9 U.S. Army Officers Captain Roland Schwartz and
10 2nd Lieutenant Hattori.

11 The witness MATSUMURA, Tomokatsu may
12 now be placed at the disposal of the Defense
13 Counsel for cross-examination.

14 THE PRESIDENT: We will recess now for
15 fifteen minutes.

16 (Whereupon, at 1440, a recess was
17 taken until 1455, after which the proceedings
18 were resumed as follows.)
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1 MARSHALL OF THE COURT: The International
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Dr. KIYOSE.

4 DR. KIYOSE: I should like to make a brief
5 cross-examination.
6

7 CROSS-EXAMINATION

8 BY DR. KIYOSE:

9 Q In your affidavit, that is in the fourth
10 page of the Japanese affidavit or in the third page --
11 third paragraph of your affidavit in English, you say
12 that matters concerning the political aims of war against
13 Soviet Russia were under the authority of the govern-
14 ment and I know nothing about them. Now, may I under-
15 stand that the fact that our country had a strategic
16 plan against Soviet Russia did not mean that our
17 country had the intention of waging a war against Soviet
18 Russia? Am I allowed to understand it in that fashion?

19 A That is an entirely different question.

20 Q You further state that questions of policy
21 were determined by the government and I, myself, do
22 not know anything about them. Does this mean that not
23 only you but all of you in high command, who are
24 engaged in duties within the high command, did not know
25 whether the government had intention of waging war

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1 against a foreign country or not?

2 THE MONITOR: Correction: That the high
3 command or any branches thereof did not interfere
4 in questions of policy which were determined by the
5 government.

6 A I am speaking only of myself and others who
7 are in similar positions.

8 Q Was it customary to formulate strategic plans
9 against any foreign countries whether or not the govern-
10 ment itself had the intention of waging a war against
11 those particular countries?

12 THE MONITOR: Slight correction: Did the
13 Japanese government formulate any strategic plans any-
14 way?

15 A I saw the operations plan only in my capacity
16 as chief of the operations section of the Kwantung
17 Army Headquarters. When I was in other positions I
18 didn't see such plans, so I can't testify with respect
19 to them.

20 Q You belonged to the Kwantung Army in the year
21 1945 instead of the years 1942 and 1943 as you state
22 in your affidavit, isn't that right? Tell me about
23 operational plans entertained by the Kwantung Army in
24 the years 1944 and 1945.

25 A In 1944 and 1945 a separate operations plan

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for defensive purposes were formulated.

Q Can you outline those plans briefly?

A The plan for 1944 was generally operations to be carried out in the border areas. Defensive operations in the border areas. The operational plans for 1945 was an internal defensive plan constituting various plans for retreat along the southeastern border of region of Manchuria and to carry on -- for the purpose of carrying on a holding operation.

Q There is something which I don't understand there. That is the operational plan in which you personally participated weren't there. Why are they not mentioned in your affidavit?

A I only spoke in answer to questions and that was all that was asked of me during the interrogation.

Q Does that mean that no question was asked with respect to this point or that it was omitted later on very close study as unnecessary?

A When preparing the affidavit there was no questions relative to this point.

Q How about when preparing the affidavit?

A Yes, when I was interrogated as a prisoner I spoke of the entire matter.

Q Then I shall ask you another question. Was there any instance of the strength of the Kwantung Army

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1 being deployed and decreased during your tenure of
2 office in the Kwantung Army?

3 A Yes.

4 Q When did it -- at about what time did it occur
5 and what was the importance of the decrease?

6 A From the summer of 1943 up to the end of the
7 war the Kwantung Army, units of the Kwantung Army were
8 deployed greatly and the Kwantung Army was reorganized.
9 I can't recall exactly when or to what extent such a
10 deployment and decrease took place but with respect
11 to the subject, the question of decrease, the strength
12 may have been decreased but the number of military
13 personnel not necessarily decreased. The number de-
14 creased at time and then returned to the normal number,
15 decreased again and returned to the normal number from
16 time to time.

17 Q Was the quality of the newly recruited troops --
18 was not the quality of the newly recruited troops in-
19 ferior to the troops which had formerly been recruited
20 by the Kwantung Army?

21 A Little by little the quality decreased.

22 Q My last question will be regarding intelligence.
23 Second paragraph of your affidavit you write about
24 information received from the military attache, Japanese
25 Embassy in Moscow. But wasn't it a routine matter to

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1 receive information not only from the Japanese Embassy
2 in the Soviet Union but from all the Japanese abroad
3 to the intelligence section of the General Staff Office
4 through the military attache?

5 A Yes, as you say.

6 DR. KIYOSE: That is all.

7 THE PRESIDENT: Before you go, Dr. KIYOSE,
8 the word "deployed" was used. Was it intended to use
9 the word "depleted"?

10 DR. KIYOSE: Yes.

11 MR. SHIMANOCHI: I am SHIMINOCHI, counsel
12 for the defendant OSHIMA.

13

14 CROSS-EXAMINATION (Continued)

15 BY MR. SHIMANOCHI:

16 Q German Attache Kretschmar, whose name you
17 mention in the last portion of your affidavit, where
18 was he stationed as a military attache?

19 A In Tokyo.

20 Q Does that mean that the Japanese General
21 Staff Office handed directly the intelligence
22 concerning the Soviet Union to the German Embassy?

23 A I think so, but I didn't see that done myself
24 with my own eyes.

25

MR. SHIMANOCHI: That is all.

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1 THE PRESIDENT: Major Furness.

2 CROSS-EXAMINATION (Continued)

3 BY MR. FURNESS:

4 Q General, on page 3 of your affidavit you
5 testify that the materials, intelligence materials
6 which you received were reported to the General Staff
7 Office from Japanese military attaches in Moscow. Those
8 military attaches were directly under the General
9 Staff and reported directly to them, were they not?

10 A Yes.

11 Q Are you familiar with the duties of military
12 attaches, Japanese as well as other countries, and if
13 so is it not their duty as routine to gather military
14 information and forward it to the General Staff of
15 the country of which they are a national?

16 A Yes.

17 THE PRESIDENT: Major Blakeney.

18 CROSS-EXAMINATION (Continued)

19 BY MR. BLAKENEY:

20 Q Mr. Witness, in your affidavit you have stated
21 that the plan for the 1942 operations of the Kwantung
22 Army were forwarded by the General Staff and that upon
23 the basis of those plans the Kwantung Army staff drew
24 its plans. Was the plan which was forwarded from the
25 General Staff Office in Tokyo an extremely complete

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1 plan?

2 A I don't get what you mean by the word "complete."

3 Q I mean, was the plan complete in the sense
4 that it laid out orders for each army, group of each
5 army, and perhaps each division in the event of
6 hostilities?

7 A The order did not include such details.

8 Q Then the plan was drawn only in general detail.
9 Is that your meaning?

10 A Yes. The plans received from the General
11 Staff Office, yes.

12 Q And the plan then required that the staff of
13 the Kwantung Army itself make plans for its implementa-
14 tion, is that correct?

15 A Yes.

16 Q Nevertheless, the plan which came from Tokyo
17 from the General Staff Office was the plan which laid
18 out the policy?

19 A Not only general policy or aim or objective
20 but the general strength of the Kwantung Army also.

21 Q That is to say that you, as a staff officer
22 of the Kwantung Army, and the remainder of the staff
23 of the Kwantung Army, and the commander in chief of
24 the Kwantung Army, had no part in formulating the
25 policy. Is that correct?

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1 A Do you mean to formulate the policy received
2 from the General Staff Office?

3 Q No, I mean that the basic policy of what actions
4 would be taken in case of hostilities, were those formu-
5 lated by Tokyo and not by the Kwantung Army.

6 A Yes, you are right.

7 Q So that, although you state in your affidavit
8 that the operations plan against Soviet Russia for
9 1942 were signed by General UMEZU and others, actually
10 the plan was drawn by them at the order of the General
11 Staff Office in Tokyo, was it not?

12 A The operational plans of the Kwantung Army
13 itself was made, formulated, by the Kwantung Army.

14 Q In accordance with the order received from
15 the General Staff Office in Tokyo?

16 A Yes.

17 THE PRESIDENT: Would he know to what extent
18 the Commander in Chief of the Kwantung Army influenced
19 the policy of Tokyo?

20 THE WITNESS: All that we know is that we
21 must carry out the aims or policy determined and
22 forwarded by the General Staff Office in Tokyo.

23 MR. BLAKENEY: That was all I intended to ask.

24 That concluding the cross-examination, I request
25 the Tribunal to direct the Marshal to serve upon the

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1 witness the subpoena in his custody.

2 THE PRESIDENT: Mr. Chief Prosecutor.

3 MR. KEENAN: If I understand correctly, the
4 cross-examination has been completed.

5 THE PRESIDENT: Does any other defense counsel
6 desire to cross-examine?

7 MR. BLEWETT: No further cross-examination,
8 your Honor.

9 MR. KEENAN: Therefore, Mr. President, since
10 this witness is in the custody of the Soviet Union,
11 I ask that he remain in that custody subject to the
12 order of this Court that he return before this Tri-
13 bunal to give testimony at the appropriate time when
14 he is desired by defense counsel, and that he not be
15 required to remain here in the interim. I have the
16 assurance from the Soviet Associate Prosecutor, which
17 I might state has been always found to be highly
18 dependable, that this witness will be available at the
19 Court's direction at whatever time is required, of course,
20 for the legitimate purposes of this trial.

21 I think I ought to state to this Court that
22 the testimony and services in that regard of the witness
23 MATSUMURA and also SEJIMA are required for other pur-
24 poses in other investigations and trials pending in the
25 Soviet at the present time. And that is the reason

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24 poses in other investigations and trials pending in the
25 Soviet at the present time. And that is the reason

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1 for this request. And as witnesses in those proceed-
2 ings in the Soviet and in proceedings that are recognized
3 and provided for in the Charter establishing this Court
4 and these proceedings too.

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1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: I cannot conceive how this
3 matter is arguable.

4 THE PRESIDENT: Well, if you do not want to
5 argue it, we can give our decision. But I might
6 need your assistance. It seems to me that the sub-
7 poena already served on him has placed him effective-
8 ly in the custody of this Tribunal. And the position
9 will not be improved if the second subpoena issued
10 by the defense is served. The position will be
11 exactly the same.

12 Now, we must hold him here until we have
13 disposed of his evidence. He is held by the Rus-
14 sian authorities at the direction of this Court
15 which is an international court comprising eleven
16 nations and which does not consist of merely one
17 nation. The defense should be at liberty, if they
18 persist, to serve the subpoena on him and also to
19 take a proof of his evidence, as I suggested yester-
20 day.

21 Subject to that, he is to remain in the cus-
22 tody of the Russian authorities, but he is to be
23 dealt with by them as directed by the Court so far
24 as his movements are concerned. If it is desired to
25 take him out of the jurisdiction, then that must be

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1 the subject of a separate application supported by
2 evidence.

3 I have not definitely judged. That is what
4 I propose, subject to what you have to say, Major
5 Blakeney.

6 MR. BLAKENEY: If the President's remarks
7 constitute a direction that the witness be made
8 available for consultation with the defense, that is
9 all we desire.

10 THE PRESIDENT: My colleagues may desire
11 to qualify what I said. I shall consult them.

12 (Whereupon, a discussion was had
13 off the record.)

14 In carrying out that direction, we suggest
15 that you arrange with the Chief Prosecutor for a time
16 at which the proof will be taken.

17 MR. BLAKENEY: Privately, of course?

18 THE PRESIDENT: With all proper safeguards
19 as to his custody, but privately, otherwise.

20 If you have any difference with the prose-
21 cution, you can ventilate it here later.

22 MR. BLAKENEY: That is eminently satisfac-
23 tory. I have no desire to become his guardian.

24 THE PRESIDENT: Colonel Rosenblitt.

25 The witness is released on the usual terms.

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1 He is still in the custody of the Court, neverthe-
2 less.

3 (Whereupon, the witness was ex-
4 cused.)

5 COLONEL ROSENBLIT: As evidence of serious
6 preparations of Japan for an attack against the
7 USSR as far back as 1943, I shall produce in evi-
8 dence the affidavit of March 29, 1946 of the Japan-
9 ese Major General OTSUBA, Kajuma, who, in 1943, was
10 chief of the headquarters of the 23rd Japanese di-
11 vision, dislocated in Manchuria at that time, prose-
12 cution document No. 1981.

13 THE PRESIDENT: Mr. Logan.

14 MR. LOGAN: The defense objects to the last
15 question and answer set forth in the affidavit on
16 page ten thereof on the ground that it is a question
17 of assuming facts not in evidence. Secondly, we ob-
18 ject to the form of the question, and it is asking
19 for conclusions which are unsupported by the facts
20 set forth in the affidavit. And furthermore, it is
21 calling for conclusions which would usurp the func-
22 tions of the Court in its endeavor to determine re-
23 sponsibility, if any, of these accused.

24 MR. GOLUNSKY: If the Tribunal please, we
25 agree that this affidavit be accepted as evidence

1 with the exception of the last question and answer.

2 THE PRESIDENT: The position is covered by
3 our earlier decision this afternoon. The objection
4 is allowed.

5 Colonel Rosenblitt.

6 COLONEL ROSENBLITT: I want to call the
7 Tribunal's attention to the question, line 3 on
8 page 9 of the Japanese original, where the word
9 "plans" is missing by mistake.

10 It is evident from Major General OTSUBA's
11 testimony that in August 1943, he was present at a
12 conference at the headquarters of the Sixth Army in
13 the Town of Khailar, which conference was devoted
14 to the question of the coming military operations of
15 the Sixth Army in the war against the USSR. The
16 conference was conducted by Major General IGETA,
17 chief of the headquarters of the Sixth Army.

18 Here it is as described by OTSUBA.

19 I did not get the exhibit number.

20 THE PRESIDENT: Admitted on the usual terms.

21 CLERK OF THE COURT: Prosecution's document
22 No. 1981 will receive exhibit No. 837.

23 (Whereupon, the document above
24 mentioned was marked prosecution's exhibit
25 No. 837 and received in evidence.)

1 COLONEL ROSENBLIT: I quote from page 6
2 of the English text:

3 "A As the Kwantung Army was to take the
4 offensive in the areas of the Maritime Province during
5 the first step of the war against the USSR, the 6th
6 Army was to go on the defensive in its area. There-
7 fore, through the first two days of the conference,
8 the plan of defense in the area of the 6th Army was
9 discussed. It was the scheme of the commander that
10 we were to fight to death against the enemy in the
11 Zabaikalye Area until new divisions would arrive to
12 the Second front. On the third day of the conference,
13 the offensive operation was studied. The operation
14 was to be executed by the Front and the Army, rein-
15 forced by new formations. In this occasion, the 2nd
16 front was to attack in the direction of Chita. The
17 commander's plan was, after concentrating the main
18 body in the area of Hailar, to make an attack from
19 the southern district of Lake Dalainoor by an en-
20 circlement movement, behind the right wing of the
21 Zabaikalye front and advance to Borzia Area, destroy-
22 ing the enemy forces and cutting off their retreat."

23 I skip a number of lines and quote further:

24 "A At least twenty divisions were re-
25 quired in order to achieve the objective of attack

1 in the area of Chita. However, our strength in this
2 area was sufficient just to make a strong resistance.
3 Therefore, in order to attack, reinforcement of be-
4 tween fifteen and twenty divisions from other areas
5 was necessary. The regrouping of the Kwantung Army
6 could be done only after the occupation of the
7 Soviet Maritime Province and the accomplishment of
8 the initial stage of war."

9 Now, if the Tribunal please, I shall present
10 the affidavit of one more witness, KUSABA, Tatsumi,
11 former Lieutenant-General of the Japanese Army.

12 MR. FURNESS: If the Court please, we make
13 the usual request that this witness be produced for
14 cross-examination and that we be advised of his stat-
15 us.

16 COLONEL ROSENBLIT: Now, if the Tribunal
17 please, I shall present the affidavit of one more
18 witness, KUSABA, Tatsumi, former Lieutenant General
19 of the Japanese Army. The Tribunal are aware of
20 the fact that KUSABA was offered --

21 (Whereupon, Mr. Furness began to
22 speak at the lectern.)

23 THE PRESIDENT: I will call on you, Major
24 Furness, when there is nobody else talking.

25 Major Furness, your application -- the

1 production of the witness you mentioned -- will be
2 considered.

3 MR. FURNESSE: I am referring to the affiant,
4 Kazuma OTSUBO, exhibit 837.

5 COLONEL ROSENBLIT: The Tribunal are aware
6 of the fact that KUSABA was offered to be intro-
7 duced as a witness by the prosecution and was accord -
8 ingly summoned by the Tribunal. He was brought from
9 the Soviet Union to Tokyo, and on the night of Sep-
10 tember 20, committed suicide. I submit to the Tri-
11 bunal a death certificate given by Major General
12 Kislenko, Deputy Member for the USSR, of the Allied
13 Council for Japan of October 9, 1946.

14 Thus we are not able to produce the witness
15 KUSABA in court, and we can only present to the Tri-
16 bunal his affidavit written by himself in the Japan-
17 ese language in Khabarovsk on March 25, 1946.

18 I offer in evidence this affidavit, prose-
19 cution document No. 1982.

20 MR. SHIMANOUCHI: I am SHIMANOUCHI, counsel
21 for the accused OSHIMA. I refer the Tribunal to
22 prosecution document No. 1982, page 7 of the English
23 text, page 10 of the Japanese text, through the en-
24 tire answer to the question, "Who agreed with this
25 opinion?"

1 I am referring to the passage where it says
2 that, among others, OSHIMA "and many others and their
3 activities were concentrated in attacking the terri-
4 tories of the USSR, China, and the Republic of Outer
5 Mongolia, and they also urged the occupation of the
6 South Sea Islands by Japanese forces" with Manchuria
7 as a base.

8 In so far as OSHIMA is concerned, I object
9 to the tendering of this document as evidence. My
10 reasons are as follows:

11 THE PRESIDENT: I wish you would point out
12 what particular part you are objecting to.

13 MR. GOLUNSKY: Perhaps we can save time if
14 I say we agree to withdraw the whole question and
15 the whole answer.

16 THE PRESIDENT: The objection is allowed.
17 The affidavit of KISABA and the certificate
18 of death are admitted on the usual terms.

19 CLERK OF THE COURT: Prosecution's document
20 No. 1982 and the certificate of death attached there-
21 to will be given exhibit No. 838.

22 (Whereupon, the documents above
23 mentioned were marked prosecution's exhibit
24 No. 838 and received in evidence.)

25 THE PRESIDENT: It is a lengthy affidavit.

1 It may be read on Monday. We will adjourn now until
2 half past nine on Monday morning.

3 (Whereupon, at 1555, an adjourn-
4 ment was taken until Monday, 21 October
5 1946 at 0930."
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